

# **Bredon Parish Neighbourhood Plan 2016-2030**

## **Consultation Statement**

Published by Bredon & Bredon's Norton Parish Council in accordance with the Neighbourhood Planning (General) Regulations 2012 and EU Directive 2001/42

**May 2016**

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## 1. Introduction

- 1.1 This statement has been prepared by Bredon & Bredon's Norton Parish Council ("the Parish Council") to accompany its submission to the local planning authority, Wychavon District Council, of the Bredon Parish Neighbourhood Plan ("the Neighbourhood Plan") under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 ("the Regulations").
- 1.2 The Neighbourhood Plan has been prepared by the Parish Council, a qualifying body, for the Neighbourhood Area covering the whole of the Parish of Bredon & Bredon's Norton ("Bredon Parish"), as designated by Wychavon District Council on 17<sup>th</sup> March 2015.
- 1.3 Under Regulation 15(2) of the Regulations, "consultation statement" means a document which:
  - a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - b) explains how they were consulted;
  - c) summarises the main issues and concerns raised by the persons consulted;
  - d) and describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.
- 1.4 This document is intended to provide a record of the consultations which have taken place during the preparatory stages of the Neighbourhood Plan, as well as an account of how the main issues and concerns emerging from these consultations have been considered and addressed.
- 1.5 The section headings below relate to the main stages of the plan's development and follow a chronological order.

## **2. The Roles of the Parish Council and advisory group**

### **Parish Council**

- 2.1 Bredon & Bredon's Norton Parish Council is the 'qualifying body' responsible for preparing and submitting the Neighbourhood Plan.
- 2.2 In November 2014, the Parish Council voted unanimously to begin production of a neighbourhood plan covering the whole of the parish of Bredon & Bredon's Norton. Over the 19 months it has taken to produce the Neighbourhood Plan, 16 individual parish councillors have at one time or another played a direct role in helping to shape the emerging plan.

### **Advisory group**

- 2.3 From February to April 2015, the Parish Council oversaw the formation of the 'Bredon Parish Neighbourhood Plan Group' as an advisory group to help lead and manage the plan-making process.
- 2.4 The group was comprised of a combination of (up to) seven parish councillors and eleven volunteers from the local community. It aimed to be reasonably gender-balanced and to represent a broad range of ages, backgrounds and experience drawn from all villages in the parish. The membership of the advisory group has been recorded in the Acknowledgments section of Neighbourhood Plan.
- 2.5 Parishioners were invited to join the advisory group via notices posted on the parish noticeboards and at the public drop-in event held in February 2015 (see Section 4 below). The Parish Council welcomed all applicants. Under its terms of reference, the group provided assistance with gathering evidence, plan drafting, community engagement, and other tasks.
- 2.6 Between them, members of the Parish Council and advisory group provided expertise in the fields of heritage, IT, legal services, landscape design, marketing, farming, education, property, utility provision, and road safety.

### **3. Gathering evidence**

- 3.1 From December 2014 onwards, The Parish Council and advisory group (following its establishment) set about gathering the background information and evidence that would help to inform the production of the Neighbourhood Plan.

#### **Bredon Village Design Statement 2011**

- 3.2 The prime resource has been the Bredon Village Design Statement 2011 (VDS). This was adopted by Wychavon District Council as a Local Information Source in July 2011. It forms a major part of the Evidence Base for the Neighbourhood Plan, and underpins many of its policies.
- 3.3 The VDS provides factual analysis about the built and landscape environment for use by planning authorities, both when deciding planning applications, and when drawing up new policies. It also provides guidance on aligning planning policy making and decision taking with residents' own aspirations for the parish.
- 3.4 The VDS was informed by three separate consultative exercises and enjoyed high levels of community participation.

#### **External sources**

- 3.5 The Neighbourhood Plan has been informed by a variety of other sources including:
- Bredon Conservation Area Appraisal (2008)
  - Bredon's Norton Conservation Area Appraisal (2006)
  - Cotswolds AONB Management Plan (2013-2018)
  - Cotswolds District Council, Cotswold Design Code SPG (2000)
  - English Heritage, Guidance on Management of Conservation Areas (2006)
  - Natural England, NCA Profile, 106 Severn & Avon Vales (2014)
  - South Worcestershire Development Plan (Feb 2016)
  - SWDP, The Village Facilities & Rural Transport Survey (2012)
  - Worcestershire County Council, Bredon Ward profile statistics (2011)
  - Worcestershire County Council, Landscape Character Assessment (2012)
  - Worcestershire Historic Environment Record
  - Wychavon District Council, Residential Design Guide SPD (2010)

#### **Internal assessment and analysis**

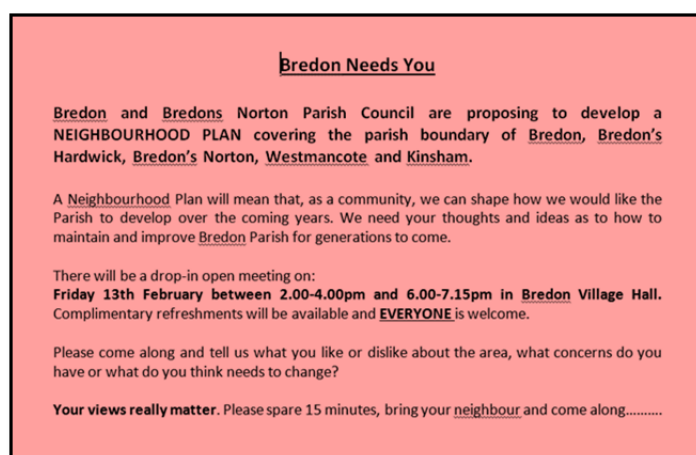
- 3.6 Where necessary, the Parish Council and advisory group have undertaken internal data gathering exercises and analysis to help inform plan-making. These have covered areas such as:
- Local Green Space
  - Local Gaps
  - Population statistics and housing numbers
  - Local heritage assets
  - Key Views

## 4. Engaging with local opinion (Feb-Apr 2015)

- 4.1 The community of Bredon Parish has been highly involved with planning matters over recent years. Residents achieved some of the highest participation rates in the West Midlands Spatial Strategy and South Worcestershire Development Plan consultations. Local people were closely engaged with the creation of the Bredon Village Design Statement (adopted as a Local Information Source by Wychavon District Council in 2011). The community also played a key role in contesting two major planning appeals in 2015. In both cases, the inspectors agreed with the chief arguments put forward by residents and dismissed the appeals. These clear and consistent expressions of local opinion, particularly the consultations underpinning the VDS, have helped to inform the preparation of the Neighbourhood Plan.
- 4.2 Engagement with the local community is essential to neighbourhood planning. The first priority of the Parish Council and advisory group has been to seek the opinions of local people at every stage of the plan's development.
- 4.3 The principal means of community engagement prior to plan drafting were:
1. a public drop-in event;
  2. Public Consultation Survey; and
  3. ongoing communication.

### Public drop-in event (Feb 2015)

- 4.4 A public drop-in event was held at Bredon Village Hall on 13<sup>th</sup> February 2015 at two different time-slots (2-4 pm and 6-7.15 pm). It was attended by approximately 320 members of the local community.
- 4.5 The event had been advertised to all residents, businesses and resident landowners in the parish by means of flyers (hand delivered to every property by volunteers), printed banners, posters in the village shop, notices on parish noticeboards, advertisements in the Parish Magazine and in the Bredon Hancock's First School 'Bugle' newsletter.



- 4.6 The hall was set-up in a café style to encourage people to take their time finding out about the plan whilst enjoying complimentary refreshments. Members of the Parish Council and advisory group were on hand to answer questions.

- 4.7 Attendees were encouraged to answer the following questions using flip charts:
- What were the most positive and negative aspects about living in the parish?
  - How could life in the parish be improved?
- 4.8 There were areas set aside for people to view, digest and comment on the following:
- The essentials of neighbourhood planning, and whether it should be undertaken in Bredon Parish;
  - The Bredon Village Design Statement 2011, and whether its guidelines, Key Open Spaces and Key Views were still relevant;
  - Wychavon District Local Plan / SWDP inset maps of the five villages, showing existing planning designations such as development boundaries, conservation areas, AONB, etc;
  - The Conservation Area appraisals for Bredon and Bredon's Norton.

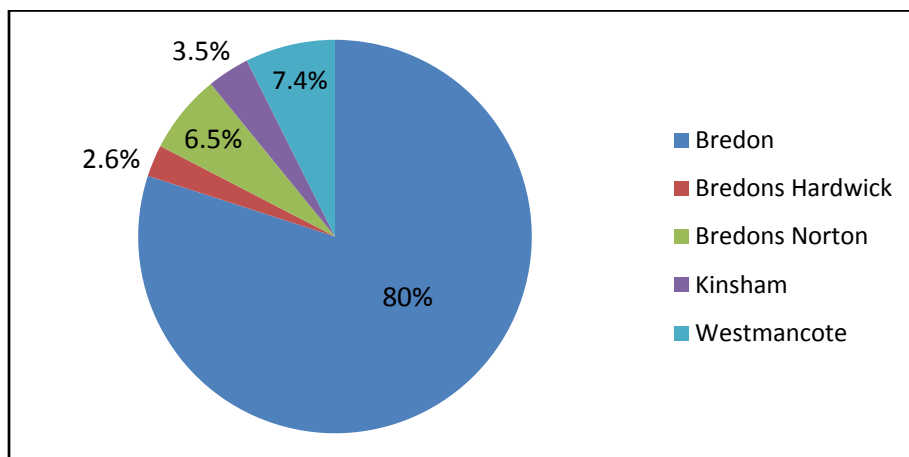


- 4.9 Attendees were asked to stick post-it notes on maps indicating any open spaces or views that they considered to be of particular local significance with regard to beauty, historic significance, recreational value, tranquillity or wildlife.

- 4.10 Copies of the Public Consultation Survey (see following paragraph) were given to all attendees, who were encouraged either to complete questionnaires at the event or else to take part in the survey at a later date.

#### **Public Consultation Survey (Feb-Apr 2015)**

- 4.11 All households, businesses and resident landowners in the parish were invited to take part in a Public Consultation Survey between February and April 2015.
- 4.12 As stated above, hard copies of the survey questionnaire were handed out at the public drop-in event. An online version of the survey was also available throughout the spring of 2015, hosted by SurveyMonkey. This was publicised by means of the Parish Magazine, public notices and social media.
- 4.13 The survey gave residents the opportunity to express their views on key areas related to neighbourhood planning, such as where new development should be located, what form it should take and which local services should be prioritised.
- 4.14 A key intention of the survey was to discover if views had changed in the four years since the consultations into the Bredon Village Design Statement had been undertaken, or whether opinions were broadly the same.
- 4.15 The full results of the survey can be seen in Appendix A.
- 4.16 Approximately 237 respondents took part in the survey across the parish. Participants can be broken down by geographic location as follows:



#### **Ongoing communication**

- 4.17 Throughout the plan preparation period, the Parish Council and advisory group used a number of different communication and engagement methods to keep residents informed about developments in the plan and to invite participation on an ongoing basis. These included:
- Bredon Parish Council website ([bredonpc.org.uk](http://bredonpc.org.uk))
  - Social media – Bredon Parish Council Facebook page and Twitter account (@BredonPC)



- Regular features in the Parish Council's dedicated page in the Parish Magazine. The magazine is produced monthly and is delivered to 810 households (approximately two-thirds of households in the parish). Copies of the Parish Council's page are also placed in Draper's Shop each month next to the Post Office counter.
- Posters informing residents of each stage of development in the Neighbourhood Plan process were displayed on all parish noticeboards.
- Large printed banners were displayed in prominent roadside locations around the parish to advertise public events and consultations.

### **Main issues & concerns emerging from engagement**

- 4.18 After collating information from the public drop-in event and the Public Consultation Survey, it became clear that very strong consensus existed in a number of areas.
- 4.19 The engagement process made it clear that the views expressed by residents during the Bredon Village Design Statement consultation process continued to be firmly held.
- 4.20 A strong sense of community pride emerged from the engagement process, with residents placing particular importance on the beauty of the local landscape and on certain facilities and services. The top five key positive features according to survey respondents were:
- Health facilities (Bredon Surgery): 93% of respondents stated these were either "still a key positive feature" or "better" than in 2011.
  - Services (PO, Shop and Pubs): 92% of respondents stated these were either "still a key positive feature" or "better" than in 2011.
  - Beautiful landscape: 91% of respondents stated this was either "still a key positive feature" or "better" than in 2011.
  - Community spirit and community events: 91% of respondents stated these were either "still a key positive feature" or "better" than in 2011.
  - Sports and recreation facilities: 90% of respondents stated these were either "still a key positive feature" or "better" than in 2011.
- 4.21 Several of the features regarded as negative in 2011 were found to have deteriorated further by 2015. The top five key negative features identified in the survey were:
- Excessive vehicle speeds: 86% of respondents stated these were either "still a negative feature" or "worse" than in 2011.
  - Serious and dangerous traffic congestion: 82% of respondents stated this was either "still a negative feature" or "worse" than in 2011.
  - Noise pollution from M5 motorway: 79% of respondents stated this was either "still a negative feature" or "worse" than in 2011.
  - Lack of evening and weekend bus services: 76% of respondents stated this was either "still a negative feature" or "worse" than in 2011.
  - Loss of open countryside between settlements: 74% of respondents stated this was either "still a negative feature" or "worse" than in 2011.

- 4.22 The most used facilities within the parish were Draper's Shop and Post Office, Bredon Village Hall, the playing fields and three pubs. 80% of survey respondents used Draper's at least once a week.
- 4.23 Preserving rural character.
- An overwhelming 98% of survey respondents stated that it was a priority to maintain open countryside between the settlements in the parish.
  - 96% of survey respondents felt it was important to preserve the Key Open Spaces defined in the VDS.
  - 94% of survey respondents wanted to preserve the Key Views defined in the VDS.
  - 81% of survey respondents wanted to maintain dark skies and avoid additional street lighting within the parish.
- 4.24 Preserving heritage.
- 97% of survey respondents stated that it was important to preserve the settings and views of historic buildings located within the parish.
  - 93% of survey respondents stated that it was important to maintain and enhance the remaining traditional orchards, and public and private allotments in the parish.
- 4.25 Work travel.
- A large majority of working respondents were found to commute to work out of the parish. 65% travelled more than 5 miles to work. A further 16% travelled up to 5 miles to work outside the parish. 14% worked from home, while 5% worked elsewhere within the parish.
- 4.26 Future Residential and Commercial Development.
- 90% of survey respondents wanted new homes to be "infill development" inside the development boundary.
  - 70% of survey respondents agreed that a target of "40% of all new housing development being affordable housing" was an appropriate way to meet the affordable housing needs of the parish, while 91% stated that affordable housing should be prioritised for people with a local connection.
  - 73% of survey respondents would encourage the development of more businesses within the parish, with a clear preference for small-scale leisure and tourism-related businesses, such as B&Bs, village shops, cafes and small commercial units.
  - 89% and 94% of survey respondents respectively did not think that large-scale leisure and tourism-related business such as caravan parks, or larger commercial units would be best suited to the parish.

## **5. Preparing the Pre-Submission Plan (May-Oct 2015)**

### **Plan objectives**

- 5.1 The Parish Council and advisory group identified a series of objectives for the Neighbourhood Plan aimed at addressing the main issues and concerns expressed during the engagement process. These were:
- To ensure sustainable and sympathetic housing development through design policies which preserve local distinctiveness and character, and which deliver the homes which people need.
  - To maintain and encourage employment opportunities within the parish encompassing all age groups and a range of skills.
  - To prevent coalescence between villages by means of Local Gaps.
  - To protect open spaces of particular local significance by designating them as Local Green Space.
  - To protect biodiversity, important landscapes and key views.
  - To preserve and enhance historic buildings and structures.
  - To maintain and enhance community facilities such as shops, Post Office, school, nursery school, playing fields, sports facilities, village halls, churches and pubs.

### **Task groups**

- 5.2 The advisory group was divided into three task groups to report on the following areas:
- Development site analysis (evaluating opportunities for new residential, employment and retail development).
  - Local Green Space analysis (evaluating potential areas of Local Green Space in and around the five villages – starting with the Key Open Spaces in the VDS and other areas identified through the engagement process).
  - Design policy development (analysis of the VDS and Conservation Area appraisals to identify guidelines that should be incorporated into Neighbourhood Plan policies).

### **Drafting**

- 5.3 The findings of each task group were discussed and agreed to by the advisory group as whole. These formed the basis of a draft plan which was prepared by planning consultants rCOH in conjunction with the advisory group. The draft was amended by the group before being passed to the Parish Council with a recommendation that it be put out to formal public consultation as a Pre-Submission Plan.
- 5.4 At its meeting of 5<sup>th</sup> October 2015, the Parish Council agreed the content of the Pre-Submission Plan which would be publicised under Regulation 14 of the Regulations.

## **6. Consulting on the Pre-Submission Plan (Oct-Dec 2015)**

### **Pre-Submission Plan**

- 6.1 The Pre-Submission Plan was publicised under Regulation 14 of the Regulations. The consultation period initially ran from 23<sup>rd</sup> October 2015 until 4<sup>th</sup> December, but it was extended until 31<sup>st</sup> December 2015 to allow consultees more time to respond during the busy Christmas period.

### **Who was consulted**

- 6.2 All households, businesses and resident landowners in Bredon Parish were included in the consultation.
- 6.3 The Parish Council also consulted those statutory consultation bodies<sup>1</sup> included in a list prepared by Wychavon District Council. To this list, the Parish Council added the names of certain bodies, clubs, societies and associations which had been omitted by Wychavon. The full list of statutory consultation bodies is included in Appendix B.

### **How people and bodies were consulted**

- 6.4 The Pre-Submission Plan was published on the Parish Council website ([bredonpc.org.uk](http://bredonpc.org.uk)) along with documents from the Evidence Base. Hard copies were also available for loan from the parish clerk.
- 6.5 Each of the statutory consultation bodies was emailed an electronic copy of the Pre-Submission Plan and invited to comment.
- 6.6 Local stakeholders including businesses, farms, sports clubs, associations, churches, etc. were emailed an electronic copy of the Pre-Submission Plan and invited to comment. Where email addresses were not known, letters were hand delivered to premises giving details of the consultation.
- 6.7 Electronic copies of the Pre-Submission Plan were sent to 139 members of the local community who had provided email addresses during the engagement process.
- 6.8 Consultees were invited to send responses to the parish clerk by email or by post before the end of the consultation period.
- 6.9 The consultation was advertised via the following methods:
- A flyer was delivered to every household via the Royal British Legion;
  - Bredon Parish Council's Facebook page;
  - Bredon Parish Council's Twitter account (@BredonPC);
  - The Parish Magazine (October 2015) delivered to 810 households (approximately two-thirds of all households);
  - Bredon Hancock's First School 'Bugle' newsletter;
  - posters in Draper's shop and on all parish noticeboards;
  - large printed banners in prominent roadside locations around the parish.

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<sup>1</sup> The relevant consultation bodies are set out in Schedule 1, paragraph 1 of the Regulations.



### **Responses received**

- 6.10 Responses were received from 16 statutory consultation bodies (and their various departments). All of the responses were either generally supportive of the plan or else non-committal. A number of amendments were suggested. Full copies of the responses are included in Appendix F.
- 6.11 Responses were also received from 17 residents, resident landowners and stakeholders. All of the responses were either generally supportive of the plan or else non-committal. A number of amendments were suggested. Full copies of the responses are included in Appendix F.

### **Main issues and concerns**

- 6.12 The main issues and concerns expressed by the consultation bodies are captured in the table in Appendix C. These include: the need to illustrate Key Views on the Policies Map; the importance of recognising the needs of farming; the need to clarify the local listing policy; the number of areas potentially designated as Local Green Space; and the need to include the Cheltenham Road and Tewkesbury Road appeal sites as potential areas of Local Green Space.
- 6.13 The main issues and concerns expressed by residents and stakeholders are captured in the table in Appendix D. These include the poor quality of the mapping; the absence of some reports from the Evidence Base; and the desirability of extending GAP4.
- 6.14 An account of how the main issues and concerns expressed during the Pre-Submission Plan consultations were considered and addressed in the Revised Pre-Submission Plan is provided in Section 7 below.

## **7. Preparing the Revised Pre-Submission Plan (Jan-Feb 2016)**

### **Addressing issues from the Pre-Submission Plan consultations**

- 7.1 The advisory group oversaw the drafting of the Revised Pre-Submission Plan taking account of the main issues and concerns expressed during the Pre-Submission Plan consultations. The Assessments of Local Green Space and Local Gaps in the Evidence Base were also reviewed and updated.
- 7.2 Members of the Parish Council liaised closely with the neighbourhood planning team at Wychavon District Council during the revision period. As well as corresponding by email and phone, they met officers on 20<sup>th</sup> January 2016 to ensure that all the issues raised in the district council's consultation response of 3<sup>rd</sup> December 2015 had been fully addressed.
- 7.3 The Parish Council also communicated with Wychavon District Council regarding the final stages of the preparation of the SWDP, and how this might affect the Neighbourhood Plan. The SWDP was finally adopted on 25<sup>th</sup> February 2016 (subject to a six week High Court challenge period expiring on 6<sup>th</sup> April 2016).
- 7.4 A summary of the way that the main issues and concerns of statutory consultation bodies were considered and addressed is contained within the 'Plan response' column of the table in Appendix C.
- 7.5 A summary of the way that the main issues and concerns of local residents and stakeholders were considered and addressed is contained within the 'Plan response' column of the table in Appendix D.
- 7.6 The content of the revised plan was agreed by the advisory group before being passed to the Parish Council with a recommendation that it be put out to formal public consultation.
- 7.7 At a special meeting held on 29<sup>th</sup> February 2016, the Parish Council agreed the content of the Revised Pre-Submission Plan which would be publicised under Regulation 14 of the Regulations.

## 8. Consulting on the Revised Pre-Submission Plan (Mar-Apr 2016)

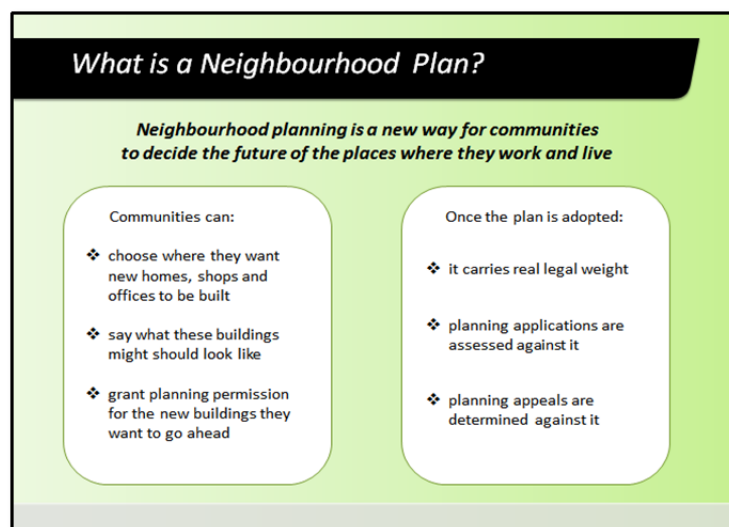
- 8.1 The Revised Pre-Submission Plan was publicised under Regulation 14 of the Regulations. The consultation period ran from 6<sup>th</sup> March until 17<sup>th</sup> April 2016.

### Who was consulted

- 8.2 All households, businesses and resident landowners in Bredon Parish were included in the consultation.
- 8.3 The Parish Council also consulted those statutory consultation bodies<sup>2</sup> included in a list prepared by Wychavon District Council. To this list, the Parish Council added the names of certain bodies, clubs, societies and associations which had been omitted by Wychavon. The full list of statutory consultation bodies is included in Appendix B.

### How people and bodies were consulted

- 8.4 The Revised Pre-Submission Plan was published on the Parish Council website ([bredonpc.org.uk](http://bredonpc.org.uk)) along with documents from the Evidence Base. Hard copies were also available for loan from the parish clerk.
- 8.5 Each of the statutory consultation bodies was emailed an electronic copy of the Pre-Submission Plan and invited to comment.
- 8.6 Local stakeholders including businesses, sports clubs, associations, churches, etc. were emailed an electronic copy of the Pre-Submission Plan and invited to comment. Where email addresses were not known, letters were hand delivered to premises giving details of the consultation.
- 8.7 Electronic copies of the Pre-Submission Plan were sent to 139 members of the local community who had provided email addresses during the engagement process.
- 8.8 An exhibition explaining the neighbourhood planning process and giving details about commenting on the revised plan was displayed in Bredon Village Hall foyer throughout the consultation period.



<sup>2</sup> The relevant consultation bodies are set out in Schedule 1, paragraph 1 of the Regulations.

- 8.9 A public presentation of the Revised Pre-Submission Plan was held in Bredon Village Hall on 20<sup>th</sup> March 2016. Members of the public were given a slideshow presentation of the plan. Hard copies of the plan and its policies were also available for viewing. Members of the Parish Council and advisory group were available to answer questions and capture feedback from the public.



- 8.10 The consultation and presentation were advertised via the following methods:

- a flyer was delivered to every household via Life in the Village Magazine;
- a second flyer was delivered to every household via Tewkesbury Direct;
- Bredon Parish Council's Facebook page;
- Bredon Parish Council's Twitter account (@BredonPC);
- The Parish Magazine (March 2016) delivered to 810 households (approximately two-thirds of all households);
- posters on all parish noticeboards;
- large printed banners in prominent roadside locations around the parish.



- 8.11 Consultees were invited to send responses to the parish clerk by email or post before the end of the consultation period.



### **Responses received**

- 8.12 Responses were received from eight statutory consultation bodies (or their departments). All responses were either supportive of the plan or non-committal while suggesting amendments. There was particular support for the heritage, landscape and biodiversity policies of the plan. Full copies of the responses are included in Appendix F.
- 8.13 Responses were also received from nine residents and local stakeholders. Most of the responses were either generally supportive of the plan or non-committal while suggesting amendments. One response was opposed to the plan. Full copies of the responses are included in Appendix F.

### **Main issues and concerns**

- 8.14 The main issues and concerns expressed by statutory consultation bodies are captured in the table in Appendix C. These include the need to update the plan in the light of the recent adoption of the SWDP.
- 8.15 The main issues and concerns of residents and stakeholders are captured in the table in Appendix D. These include the inadequate quality of the mapping; the need for cycle paths; and the undesirability of omitting some areas of Local Green Space previously included in the Pre-Submission Plan.
- 8.16 An account of how the main issues and concerns expressed during the Revised Pre-Submission Plan consultations were considered and addressed in the Submission Version is provided in Section 10 below.

## **9. Consulting landowners (Mar-Apr 2016)**

- 9.1 Planning Practice Guidance [Reference ID: 37-019-20140306] states that the qualifying body *"should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space."*
- 9.2 'Proposal' is not defined in the Guidance. However, the Parish Council considers it reasonable to interpret this as meaning any 'plan proposal' (Pre-Submission Plan) publicised under Regulation 14 of the Regulations. Where a preliminary screening exercise has taken place to determine whether land meets the selection criteria, this exercise would not in itself constitute a 'proposal' to designate land.
- 9.3 'At an early stage' is not defined in the Guidance. However, the Parish Council considers it fair to interpret this as meaning that landowners should be contacted reasonably soon after a 'plan proposal' (Pre-Submission Plan) is agreed by the Parish Council.
- 9.4 The Parish Council acknowledges that during the consultation on the Pre-Submission Plan held in October 2015, it did not contact all landowners about proposals to designate their land as Local Green Space. (Those residing in the parish had been contacted along with other residents and stakeholders). All landowners should have been notified at the outset of the consultation to allow them a reasonable period of time to comment on the proposals.
- 9.5 The Parish Council determined to rectify this omission by producing a Revised Pre-Submission Plan and repeating the Regulation 14 consultation process. Landowners would be contacted at the start of the consultation.
- 9.6 At a special meeting held on 29<sup>th</sup> February 2016, the Parish Council agreed to publicise the Revised Pre-Submission Plan under Regulation 14 of the Regulations, and to contact landowners as soon as reasonably possible about plans to designate their land as Local Green Space.

### **Which landowners were contacted**

- 9.7 The Revised Pre-Submission Plan identified approximately 83 separate registered land holdings (belonging to approximately 119 landowners) in areas designated as Local Green Space or Local Gaps in the Revised Pre-Submission Plan. The overwhelming majority of these holdings were registered at the Land Registry.
- 9.8 The Parish Council contacted all the registered owners of Local Green Space or Local Gaps. Attempts were made to discover the ownership of any unregistered land, including seeking assistance from Wychavon District Council. However, these attempts were largely unsuccessful.

### **How were landowners consulted**

- 9.9 The Parish Council wrote to all landowners on 6<sup>th</sup> March 2016 at the addresses held by the Land Registry. Landowners were informed that their land had been designated as Local Green Space or Local Gaps in the Revised Pre-Submission Plan. They were informed that the plan could be viewed along with supporting documents on the parish website. They were invited to comment on the proposals via the parish clerk.

### **Responses received**

- 9.10 In total, 22 responses were received from the owners (and their representatives) of 18 land holdings identified as Local Green Space or Local Gaps in the Revised Pre-Submission Plan. Some of these responses related to land covered by both designations. Full copies of the responses are included in Appendix F.
- 9.11 Responses relating to 14 land holdings in Local Green Space were received. The owners of 10 holdings were opposed to the designation of their land as Local Green Space.
- 9.12 Responses relating to 17 land holdings proposed as Local Gaps were received. The owners of 10 holdings were opposed to the designation of their land as Local Gaps.

### **Main issues and concerns**

- 9.13 The main issues and concerns expressed by owners of Local Green Space are captured in the table in Appendix E. These include dissatisfaction with the consultation process; the unsuitability of particular areas for designation; concern that the Neighbourhood Plan would not deliver sufficient new housing; and requests for particular areas of Local Green Space to be set aside for new housing.
- 9.14 The main issues and concerns expressed by owners of Local Gaps are captured in the table in Appendix E. These include the need for the Neighbourhood Plan to have regard to SWDP Footnote 6 regarding land at Mitton; dissatisfaction with the way the Assessment of Local Gaps in Bredon Parish had been undertaken; the unsuitability of particular areas for designation as Local Gaps; and requests for particular areas within Local Gaps to be set aside for new housing.
- 9.15 An account of how the main issues and concerns expressed during landowner consultations were considered and addressed in the Submission Version is provided in Section 10 below.

## **10. Preparing the Submission Version (Apr-May 2016)**

### **Addressing issues from the Revised Pre-Submission Plan and landowner consultations** 10.1

The advisory group oversaw the drafting of the Submission Version taking account of the main issues and concerns expressed during the Revised Pre-Submission Plan and landowner consultations. The Assessments of Local Green Space and Local Gaps in the Evidence Base were also reviewed and updated.

- 10.2 A summary of the way that the main issues and concerns of statutory consultation bodies were considered and addressed is contained within the 'Plan response' column of the table in Appendix C.
- 10.3 A summary of the way that the main issues and concerns of local residents and stakeholders were considered and addressed is contained within the 'Plan response' column of the table in Appendix D.
- 10.4 A summary of the way that the main issues and concerns of owners of land in Local Green Space and Local Gaps were considered and addressed is contained within the 'Plan response' column of the table in Appendix E.
- 10.5 The Submission Version was reviewed by the advisory group and passed to the Parish Council.
- 10.6 At a special meeting held on 16<sup>th</sup> May 2016 attended by approximately 15 members of the public, the Parish Council agreed the content of the Submission Version which would be submitted to Wychavon District Council.

### **The Submission Version of the Neighbourhood Plan**

- 10.7 The Submission Version of the Neighbourhood Plan was submitted to Wychavon District Council under Regulation 15 of the Regulations on 26<sup>th</sup> May 2016, along with the Consultation Statement, the Basic Condition Statement and other accompanying documents.

## Appendix A: Public Consultation Survey results

All households, businesses and resident landowners in the parish were invited to take part in a Public Consultation Survey between February and April 2015.

A hard copy of the survey was handed out at the public drop-in event held on 13<sup>th</sup> February 2015 at Bredon Village Hall, which attendees were urged to complete. An online version of the survey was also available throughout the spring of 2015, hosted by SurveyMonkey. This was publicised by means of the Parish Magazine and public notices.

Approximately 237 respondents took part in the survey.

### Survey Results

#### 1. Where in the parish do you live? (Please select the village you live in or nearest to)

Village	Number of responses	% of total responses
Bredon	184	80.0
Bredon's Hardwick	6	2.6
Bredon's Norton	15	6.5
Kinsham	8	3.5
Lower Westmancote / Westmancote	17	7.4

#### 2. Which age category do you belong to?

Age category	Number of responses	% of total responses
Under 18	0	0.0
19-25	3	1.3
26-30	2	0.9
31-40	26	11.2
41-50	37	15.9
51-60	44	19.0
61-64	18	7.8
65-69	41	17.7
70+	61	26.3

**3. Please select the entry that describes you best**

<b>Occupation</b>	<b>Number of responses</b>	<b>% of total responses</b>
In full time work	57	25.0
In part time work	53	23.2
Full time parent	8	3.5
Full time Carer	0	0.0
Retired	107	46.9
In full time education	1	0.4
Unemployed	2	0.9

**4. If you have children living at home (including adult offspring), please complete the following table**

	<b>0-4 yrs</b>	<b>5-9 yrs</b>	<b>10-14 yrs</b>	<b>15-18 yrs</b>	<b>19+ yrs living at home &amp; in full time Education</b>	<b>19+yrs living at home &amp; working or unemployed</b>
Child 1	16	18	22	7	6	13
Child 2	9	22	12	0	3	2
Child 3	1	1	2	0	0	3
Child 4	0	0	1	0	0	0
Child 5	0	0	1	0	0	0

**5. If your children are in Full Time Education, how do they normally get to school?**

<b>Travel method</b>	<b>Number of responses</b>	<b>% of total responses</b>
Car	15	26.8
Car Share	1	1.8
Bus	21	37.5
Bicycle	0	0.0
Walk	19	33.9

**6. For each adult household member (18+), how far do they travel to work, and how do they get there?**

	Work from home	Work in parish	Travel up to 5 miles	Travel 5-20 miles	Travel 20-50 miles	Travel over 50 miles
Person 1	19	4	22	53	19	10
Person 2	12	8	10	37	6	8
Person 3	0	0	2	4	0	1
Person 4	0	0	0	3	1	0

**7. Please select all of the appropriate areas that you feel should be explored in the Neighbourhood Plan**

Topic	Number of responses	% of total (222)
Transport, roads & paths	198	89.2
Key services ( e.g. medical, social, retail)	190	85.6
Natural environment	190	85.6
Residential housing and the built environment	190	85.6
Sustainability of the villages	187	84.2
Gardens & open spaces	180	81.1
Utilities & drainage	175	78.8
Landscape & key views	174	78.4
Sports, amenities & recreation	172	77.5
Business development & employment opportunities	148	66.7
Other (please specify)	26	11.7

**8. Are you aware that Bredon has a Village Design Statement?**

Response	Number of responses	% of total responses
Yes	165	76.7
No	50	23.3

**9. In the Village Design Statement adopted 3.5 years ago, the following came out as key positive features. How do you feel about these features now?**

<b>Key positive feature</b>	<b>Better</b>	<b>Still key</b>	<b>Neutral</b>	<b>No longer positive</b>	<b>Number of responses</b>
Excellent health facilities, Bredon Hill Surgery	53	150	13	3	219
Services, such as post office, shop, pubs	43	163	15	2	223
Beautiful Landscape	25	171	16	3	215
Community spirit & community events	60	139	14	6	219
Outstanding sports/recreation facilities	106	93	19	2	220
Safe & healthy environment for children	49	137	19	10	215
Attractive Cotswold buildings & boundary walls	17	168	25	5	215
Farming operating in and around the village	19	160	30	1	210
Low density of buildings in the conservation area	22	156	22	9	209
Open spaces, including gardens, orchards & paddocks	20	166	26	7	219
A sense of history	12	171	31	3	217
Low crime rate	33	147	16	19	215
Extensive network of public footpaths	18	155	33	7	213
Interesting historic features (obelisk, old post boxes & phone box	14	151	43	5	213
Outstanding wild life	18	148	48	3	217
Access to the River Avon	13	146	52	5	216
Exceptional Architecture	8	145	54	6	213
Absence of street lighting	17	133	43	20	213



**10. In the Village Design Statement adopted 3.5 years ago, the following came out as key negative features. How do you feel about these features now?**

Key negative feature	Worse	Still a negative feature	Neutral	No longer negative / improving	Number of responses
Excessive vehicle speeds	112	72	26	5	215
Serious & dangerous traffic congestion	115	62	35	4	216
Noise pollution from M5	74	94	45	1	214
Lack of evening & weekend bus services	62	94	47	2	205
Loss of open countryside between settlements	64	88	50	3	205
Poor maintenance of roads & rights of way	82	74	47	11	214
Litter & dog mess on footpaths	71	87	49	11	218
Inappropriate & unsympathetic new buildings in the Conservation area	30	89	81	6	206
Lack of parking	61	61	89	6	217
Lack of employment opportunity within the parish	15	87	95	5	202
Use of inappropriate boundary treatments (e.g. leylandii hedges)	14	88	98	3	203
Unsympathetic & over-large extensions	20	64	113	7	204
Over large & inappropriate signage	33	53	118	7	211
Night sky pollution	22	62	105	14	203
Absence of basic retail facilities (cafe/dry cleaner/laundrette etc.)	14	68	119	9	210
Other					44

**11. Do you or members of your household use these facilities? (Tick all that apply). Please indicate if you usually walk or use your car to get there.**

Facility	Never use	Sometimes (less than once per week)	Regularly (once per week)	Very often (more than once per week)	Do you? walk	Do you? go by car
Bredon - village shop	3	42	54	128	135	81
Bredon - Post Office	3	93	69	60	128	74
Bredon - village hall	21	128	47	26	114	52
Bredon - Church Rooms	139	52	13	13	41	28
Bredon - church	71	117	20	18	81	35
Bredon - playing fields	81	72	37	30	89	30
Bredon - small playground in Cherry Orchard	170	32	10	6	34	8
Bredon - sports clubs (active member)	160	13	16	23	32	15
Bredon - sports clubs (social member)	146	38	11	18	42	15
Bredon/ Bredon's Hardwick - pubs	37	138	31	14	94	38
Bredon's Norton - church	183	31	2	1	10	19
Bredon's Norton - village hall	178	32	8	0	13	22
Bredon's Norton - farm shop	137	60	13	1	11	38
Kinsham - chapel	209	5	0	0	3	6

**12. Are you a member of any parish sports club (tennis, cricket, rugby, football, bowls)?**

Response	Number of responses	% of total responses
Yes	69	31.2
No	152	68.8

**13. If you use your car for any of the answers to Question 11, do you ever have a problem parking?**

Response	Number of responses	% of total responses
Yes	93	50.0
No	93	50.0

**14. Do you ever use any of the bus routes in the villages?**

Response	Number of responses	% of total responses
Never or very occasionally	161	71.9
Sometimes (at least once per month)	46	20.5
Regularly (at least once per week)	17	7.6

**15. If you cycle, please complete the following table**

Cycling routine	Never / rarely	Sometimes (at least once per month)	Frequently (at least once per week)	Number of responses
On my own & on road	54	43	41	138
On my own & off road	65	20	13	98
With friends or family & on road	61	31	23	115
With friends or family & off road	71	15	12	98

**16. If cycle paths linked Bredon to Kinsham, Westmancote and Bredon's Hardwick, would this make you or anyone in your household more likely to cycle?**

Response	Number of responses	% of total responses
Definitely	81	43.8
Maybe	68	36.8
No	36	19.5

**17. Please rate the condition of the pavements within and between settlements**

Location	Condition of pavement satisfactory	Condition of pavement poor	No opinion	If pavement was improved, would you use it more often? (Tick for yes)	Number of responses
Within the village that you live in	117	65	17	55	192
Between Bredon & Westmancote	91	65	25	48	170
Between Bredon & Kinsham	51	93	28	56	159
Between Bredon & Bredon's Hardwick	30	90	28	49	140
Between Bredon & Bredon's Norton	7	91	40	50	132

**18. Does anyone in your household move around the parish on a mobility scooter or wheelchair, or with a child's buggy, and have problems on any of the pavements?**

Response	Number of responses	% of total responses
Yes	23	11.1
No	184	88.9

**19. Bredon's Hardwick, Bredon's Norton, Kinsham, Lower Westmancote and Westmancote have no street lighting. Bredon has only three urban street lights. Would you like to maintain dark night skies or increase street lighting across the parish?**

Street lighting level	Number of responses	% of total responses
Status quo – no more lights	149	81.0
Increase lighting	29	15.8
Other	6	3.3

20. If medium to large scale residential development occurs in the future, would you want it to have urban street lighting?

Response	Number of responses	% of total responses
Yes	31	14.0
No	191	86.0

21. Does your house have broadband?

Response	Number of responses	% of total responses
Yes	213	96.4
No	8	3.6

22. If the answer to Question 21 was yes, is your Broadband speed fast enough for your needs?

Response	Number of responses	% of total responses
Yes	111	50.7
No	108	49.3

23. Should it be a priority to maintain open countryside between settlements?

Response	Number of responses	% of total responses
Yes	216	97.7
No	5	2.3

24. How often do you use the green spaces by the river in Dock Lane, Bredon?

Frequency	Number of responses	% of total responses
Never	15	6.7
Rarely (less than once per month)	80	35.6
Sometimes (every month)	91	40.4
Often (every week)	39	17.3

**25. Is it important to preserve the following?**

<b>Open space / view</b>	<b>Yes – important to preserve</b>	<b>Neutral / no opinion</b>	<b>No – not important to preserve</b>
Key open spaces defined in the Bredon Village Design Statement	207	8	1
Prominent open spaces identified in the Conservation Area Appraisals for Bredon and Bredon's Norton	202	8	1
Open space identified in the Wychavon Local Plan	192	12	1
Key views identified in the Bredon Village Design Statement	195	11	1
Significant views identified in the Conservation Area appraisals for Bredon and Bredon's Norton	192	11	1

**26. Bredon Parish has a long tradition of horticulture and fruit growing. How important is it to maintain and enhance the remaining traditional orchards, and public and private allotments?**

<b>Response</b>	<b>Number of responses</b>	<b>% of total responses</b>
Very Important	144	63.2
Quite important	68	29.8
No opinion	9	3.9
Not important	7	3.1

**27. How important is it to preserve the settings and views of historic buildings located within the Parish?**

<b>Response</b>	<b>Number of responses</b>	<b>% of total responses</b>
Very important	181	79.0
Quite important	42	18.3
No opinion	2	0.9
Not important	4	1.7

**28. If we need to build more homes in the Parish in the future, where would you prefer they were located?**

Location	Number of responses	% of total responses
Open countryside outside development boundaries, between settlements	15	6.8
Infill development within large gardens (inside development boundaries)	12	5.5
Infill development within yards, redundant areas & disused buildings (inside development boundaries)	184	84.0
Sites which are currently used by businesses providing employment	8	3.7

**29. Emerging policy is that 40% of all new housing development should be reserved as affordable housing. Would you agree that this is an appropriate way to meet Bredon's affordable housing needs?**

Response	Number of responses	% of total responses
Yes	141	69.8
No	61	30.2

**30. Do you think affordable housing should be prioritised for people with a local connection?**

Response	Number of responses	% of total responses
Yes	195	90.7
No	20	9.3

**31. Should we encourage the development of more business in the Parish in the future?**

Response	Number of responses	% of total responses
Yes	148	72.9
No	55	27.1

**32. If you answered yes to Question 31, what type of business development do you think would be best suited to the Parish?**

<b>Response</b>	<b>Number of responses</b>	<b>Yes (%)</b>	<b>No (%)</b>
Village shops, cafes and retail units	151	84.8	15.2
Small commercial units and warehouses	149	77.2	22.8
Larger commercial units, factory units and warehouses	117	6.0	94.0
Small scale leisure and tourism related businesses, such as B&Bs	163	89.0	11.0
Large scale leisure & tourism businesses, such as caravan parks	122	10.7	89.4



## Appendix B: List of statutory consultation bodies consulted

Age UK Herefordshire & Worcestershire
Ancient Monuments Society
Bredon Community Play & Recreation
Bredon Hill Conservation Group
British Telecom
Canal & River Trust (PSSC)
Community First
CPRE (Wychavon)
DIAL South Worcestershire
Eckington Parish Council
Environment Agency (West) Sustainable Places
E-ON Customer Services
Equality and Human Rights Commission
Federation of Small Businesses
Fields in Trust
Forestry Commission
Gloucestershire County Council
Heart of England
Hereford & Worcester Chamber of Commerce
Hereford & Worcester Gardens Trust
Highways Agency
Historic England
Home Builders Federation
Homes and Communities Agency
Kemerton Conservation Trust
Kemerton Parish Council
Learning Difficulty/Vulnerable Adult Support Service
Marine Management Organisation
National Farmers Union
National Grid UK Gas Distribution
Natural England
Network Rail (Western Region)
NHS South Worcestershire CCG
Northway Parish Council
Older Peoples' Support Service
Physical Disability Support Service
Planning Inspectorate
Rooftop Housing

Severn Trent Water
Skills Funding Agency
Sport England
Strensham Parish Council
Superfast Worcestershire
Tewkesbury Borough Council
Tewkesbury Town Council
The Coal Authority
The Crown Estate
The Sports Partnership Hereford & Worcs
Twynning Parish Council
West Mercia Police Estate Services
West Midlands Ambulance Service
Western Power Distribution (Midlands)
Worcester Diocese
Worcestershire Council for Voluntary Youth Services
Worcestershire County Council (Legal & Democratic Services)
Worcestershire County Council (Principal Planner/Strategic Planning)
Worcestershire County Council (Voluntary & Community Sector)
Worcestershire County Council (Youth Support)
Worcestershire County Councillor Adrian Hardman (Bredon)
Worcestershire Federation of WIs
Worcestershire Historic Environment Record
Worcestershire Partnership
Worcestershire Wildlife Trust
Worcestershire Youth Support Services
Wychavon District Council
Wychavon District Councillor Adrian Darby (South Bredon Hill)
Wychavon District Councillor Adrian Hardman (Bredon)

## Appendix C: Summary of comments by statutory consultation bodies

Consultation on Pre-Submission Draft - 23 October to 31 December 2015					
#	Name	Date received	Overall response	Summary of main comments	Plan response
1	Bredon Community Play & Recreation (Debra Lincoln)	30/01/2016	Supportive	Public consultation exercise clearly worthwhile.	N/A
				Positive statistics with regard to the Playing Fields endorse BCPR's approach.	N/A
				Important that Playing Fields are protected and that they are adapted and updated to keep them fresh.	No change required - addressed already through Policy 10
				Agree with the Vision & Objectives relating to Playing Fields.	N/A
				Policy 10 - would like policy to state improvements will be encouraged through partnership working & consultation.	Policy 10 amended
				Policy 13 - it is assumed that new development will not refer to any new amenity.	No change required - policy sets out what development might be permissible
2	Cotswolds Conservation Board (Andrew Lord)	16/11/2015	Supportive	Pleased to see the detailed comments in respect of the landscape, the AONB and its ecological and heritage assets and its setting within the Plan.	N/A
				Para 3.2 - recommend inclusion of reference to NPPF 115 & 116.	Para 3.2 amended
3	Environment Agency (Tessa Jones)	03/12/2015	Non-committal	Notes that there are no additional site allocations proposed within the plan.	N/A
4	Historic England (Peter Boland)	01/12/2015	Supportive	Particularly supportive of emphasis on heritage and local distinctiveness.	N/A
				Commend approach taken to conservation of the historic environment.	N/A
				Consider plan to be well-considered, concise and fit for purpose document.	N/A
				Policy 2 - suggest identifying Key Views on a map	Key Views to be shown on map
				Policy 3 - would be strengthened by requirement to take account of VDS	Policy 3 amended
				Policy 3 - add point on need to consider archaeology	Policy 3 amended
				Policy 4 - replace 'design breaks' with 'setbacks'	Policy 4 amended
				Policy 5 - add new point on historic farmsteads	Policy 5 amended
				Policy 9 - replace 'designate' with 'identify'	Policy 9 amended

#	Name	Date received	Overall response	Summary of main comments	Plan response
5	Natural England (Liz Appleyard)	10/12/2015	No comment	Unable to assess impacts of plan as no evidence of screening for SAC & SSSI. Will respond in more detail once this provided.	N/A - WDC responsible for sending screening opinion to NE, stating that no new sites proposed in SAC/SSSI.
6	National Farmers Union (Sarah Faulkner)	03/12/2015	Non-committal, requesting amendment	Believe the plan ought to be strengthened in order to recognise the importance of farming and of supporting the economic role of the countryside.	No change required - balance needed between farming & other competing needs of local communities. The plan supports farming by emphasising retention of farmland.
				Policy 2 - concerned that this will place additional restrictions on land use - there ought to be some support within the policy for building developments that support agricultural businesses and for essential rural workers dwellings.	No change required - This policy applies to only 7% of farmland in the parish. This land fulfils a particular community function – that of maintaining open space between settlements. Essential workers dwellings are dealt with by SWDP 19.
				Provision of new housing for those employed in agriculture and rural businesses is economically important	N/A
7	Rooftop Housing (Craig MacDonald)	03/12/2015	Non-committal, requesting amendment	Asking for Housing Needs Survey to determine whether Oak Lane allocation will meet need.	No change required - not possible within timetable. Rooftop response does not take account of projected windfall housing
8	Worcestershire CC, Principal Planner (Natasha Friend)	02/12/2015	No objection, requesting amendment	Waste Core Strategy, Minerals Local Plan and emerging Minerals Local Plan should all be mentioned in Section 3.	Section 3 amended
				WCC does not think the policies proposed in NP need to be amended with respect to minerals.	N/A
				Policy 6 - amend to require landscaping schemes to take account of the setting of the development.	Policy 6 amended
				Policy 3 - amend to incorporate facilities into designs to allow occupiers to separate & store waste for recycling.	Policy 3 amended
				Para 3.7 - amend to include reference to Green Infrastructure.	Para 3.7 amended
				Policy 14 - hedgerows should be established for their biodiversity value.	Already in the policy, but wording clarified
				Policy 6 - amend to create or enhance green corridors to benefit biodiversity.	Policy 6 amended
				Policy 7 - WCC Highways is generally supportive of policy.	N/A
				Policy 7 - amend to ensure materials are complementary to Conservation Areas.	Policy 7 amended
				Policy 7 - include safety caveat for road markings/signs, kerbs and lighting.	Policy 7 amended
				Policy 3 - the use of soak aways for roof run off may be above national requirements; suggest amending.	Policy 3 amended
				Policy 3 - ask for SuDS to be used on all developments of 1 or more houses.	No change required - addressed through SWDP 29
				Policy 3 - amend to include ref to energy efficiency.	Policy 3 partly amended - but addressed through SWDP 27

#	Name	Date received	Overall response	Summary of main comments	Plan response
9	Wychavon DC, Community Development (Jem Teal)	03/12/2015	Supportive, requesting amendment	NP could highlight the need to expand the recreational area and consolidate satellite pitches on one site.	No change required - consider this is already provided for under Policy 10.
10	Wychavon DC, Conservation (Elaine Artherton)	03/12/2015	Supportive	Welcomes many references to CA appraisals for Bredon and Bredon's Norton.	N/A
11	Wychavon DC, Development Manager South (Jonathan Edwards)	03/12/2015	Supportive, requesting amendment	Policy 4 part 3 - does this mean 50% of floor area or footprint? 50% seems arbitrary and may be cumbersome to enforce.	Policy 4 amended and new para 6.15 justifying 50% limit.
				Policy 6 - does not reflect PD rights	No change required - but new para 6.2 states PD rights take precedence over NP, but these can be removed by Article 4 Direction.
				Policy 9 - should be expanded to make clear what protection local listing gives buildings; should be noted that this has less weight than statutory listing.	Policy 9 amended
				Policy 13 - NPPF Green Belt policy defines certain types of development as being appropriate.	Policy 13 amended to exclude reference to NPPF exceptions.
				Policy 13 - LGS designation will not be appropriate for most green areas or open space; what is the justification for allocating so many in the NP?	Policy 13 amended - number of LGS sites to be reduced & fully justified.
				Policy 14 - "will be refused" goes a step further than the NPPF.	Policy 14 amended to "will be resisted"
12	Wychavon DC, Economic Development (Jane Dobson)	04/12/2015	Supportive	Policy 11 - support this policy	N/A
				Policy 12 - support this policy	N/A
13	Wychavon DC, Heritage Champion & cllr for Westmancote (Cllr Adrian Darby)	11/12/2015	Supportive	Sites which were subject to planning appeals APP/H1840/A/14/2217607 (Cheltenham Rd) and APP/H1840/A/14/2222679 (Tewkesbury Rd) should be included as LGS, as both sites were regarded by planning inspectors as being special and locally significant, and thus qualify for LGS designation.	Yes - amended
14	Wychavon DC, Landscape (Eileen Marshall)	03/12/2015	Supportive, requesting amendment	Policies 2, 6, 8, 13 and 14 - approach to landscape issues generally well-considered	N/A
				Policy 14 - "will not generally be supported" instead of "will be refused".	Policy 14 amended to "will be resisted"

#	Name	Date received	Overall response	Summary of main comments	Plan response
15	Wychavon DC, Planning Policy (Reiss Sadler / Andrew Ford)	03/12/2015	Supportive, requesting amendment	R Sadler had very little contact with the NP group between Neighbourhood Area designation and draft NP consultation.	N/A - however group had repeated contact with A Ford by email & phone. Repeat Reg 14 consultation.
				Various minor textual corrections and additions.	Corrected
				SEA Screening Opinion not yet undertaken.	SEA screening undertaken
				Policy 1 - inconsistent wording between paragraphs relating to Bredon development boundary.	Policy 1 amended
				Policy 2 - the principle of Local Gaps is accepted with the SWDP Inspector supporting the Significant Gap policy in SWDP2, however GAP5 rather large.	Policy 2 amended - reduce area of GAP5
				Policy 5 - uPVC windows allowable under PD rights so NP can't specify otherwise.	No change required - but new para 6.2 states PD rights take precedence over NP, but these can be removed by Article 4 Direction.
				Policy 9 - principle is supported, but calling policy 'Local Heritage Assets'.	Policy 9 amended
16	Wychavon DC, Strategy & Communication (Cherrie Mansfield)	03/12/2015	Supportive, requesting amendment	Suggests reference to NHB monies in Local Priorities.	Para 7.6 amended
				Policies 3 and 4 - more proactive approach to sustainable construction and renewables needed.	Policies 3 & 4 amended
				Paragraphs 6.4 and 6.5 – encourage PC to nominate listed sites as ACV.	N/A
Consultation on revised Pre-Submission Draft - 6 March to 17 April 2016					
1	Environment Agency (Tessa Jones)	07/03/2016	Non-committal	Repeating comments of 3/12/2015.	N/A
2	Gloucestershire County Council (Robert Niblett)	04/04/2016	Supportive	NP might want to mention that the parish adjoins Upham Meadow SSSI.	No change required - already included as part of the SSSI is within parish.
				Policy NP14 is appropriate and welcomed adjacent to Gloucestershire border.	N/A
3	Historic England (Peter Boland)	13/04/2016	Supportive	Gratified to see that the amendments previously suggested by Historic England have been incorporated.	N/A
				Supportive of content of document, particularly emphasis on the heritage of the Parish and local distinctiveness.	N/A
				Highly commend the approaches taken in the Plan to the historic environment and consider it to be a well-considered, concise and fit for purpose document.	N/A
4	Kemerton Conservation Trust	29/03/2016	Supportive	Pleased to see policies in respect of landscape, AONB, biodiversity & heritage.	N/A
				Welcomes in particular Policies NP 1, 2, 9, 13 & 14.	N/A
				Considers NP well-considered and fit for purpose.	N/A

#	Name	Date received	Overall response	Summary of main comments	Plan response
5	National Grid (Amec Foster Wheeler)	01/04/2016	No comment	No high voltage electricity assets / high pressure gas pipelines in plan area.	N/A
6	Natural England (Gillian Driver)	17/04/2016	Supportive	Welcome criteria within various policies for green infrastructure (eg SUDs, green corridors) & sustainable construction which promote sustainable development.	N/A
				NP14 (Landscape & Biodiversity) - NE welcomes this policy.	N/A
7	Network Rail (Barbara Morgan)	13/04/2016	Non-committal, requesting amendment	Draws attention to The Town and Country Planning (Development Management Procedure) (England) Order 2015, relating to publicity for planning permission within 10 metres of relevant railway land.	No change required.
				Requests policy requiring developers to fund upgrade of existing facilities and infrastructure where increased patronage results from new development.	No change required - advisory group lacks expertise / evidence to develop such a policy.
				The planning authority must consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume / or change of character of traffic using a level crossing.	No change required.
				Request the opportunity to comment on any future planning applications within close proximity to the railway	N/A
8	Wychavon DC, Planning Policy (Reiss Sadler)	18/03/2016	Supportive	Pleased that the issues previously raised by WDC have been addressed.	N/A
				All references to the Wychavon District Local Plan should now be removed.	Corrected throughout
				The WDLP maps are out of date and should be replaced.	Maps to be updated in submission Neighbourhood Plan

## Appendix D: Summary of comments by local residents & stakeholders

Consultation on Pre-Submission Draft - 23 October to 31 December 2015					
#	Name	Date received	Overall response	Summary of main comments	Plan response
1	Michael Barrett	24/10/2015	Supportive	Very thorough and well thought out plan.	N/A
				5.2 - add village halls to last bullet point.	Para 5.2 amended
				Map legends not legible.	Maps to be improved in submission Neighbourhood Plan
				5.11 add Bredon's Norton to village gaps.	No change required - does not meet selection criteria
				Policy 13 - Bredon's Norton COM13 green space not included.	No change required - COM13 space excluded under selection criteria
2	Thomas Carr (Vets)	09/12/2015	Supportive	Plan protects character of parish and seems sensible and well thought out.	N/A
				Would like street lighting in Station Drive.	No change required - majority of survey respondents against more lighting.
3	Allan Cliff	31/12/2015	Non-committal	Maps could have been overlaid for better clarity.	Maps to be improved in submission Neighbourhood Plan
				Certain points could have been "bullet pointed" with links to more specific comment.	No change required - unclear what points comment refers to.
4	Vicki Cliff	31/12/2015	Non-committal	Maps could have been overlaid for better clarity.	Maps to be improved in submission Neighbourhood Plan
				Certain points could have been "bullet pointed" with links to more specific comment.	No change required - unclear what points comment refers to.
5	Malcolm Dunn	03/12/2015	Supportive, requesting amendment	Very comprehensive and well thought out document.	N/A
				Policy 10 - first para overly restrictive.	Policy 10 amended.
				Should be a public meeting presenting the plan so that feedback could be captured from those attending.	Noted - public meeting recommended for Revised Pre-Submission Plan consultation.
				Policy 13 - "except in very special circumstances" should be deleted.	No change required - existing wording adds weight.
				Section 6 - welcome inclusion of Assets.	N/A
				Section 6 - should be more on community involvement.	Section 6 amended.
6	Carl Gray	09/11/2015	Supportive, requesting amendment	CA boundary incorrect on Plan B.	Maps to be improved in submission Neighbourhood Plan.
				Are the development boundaries going to be reviewed?	No change required - outside scope of NP.
				Analysis reports missing from Evidence Base.	Noted - website updated.
7	Melanie Gray	09/11/2015	Supportive, requesting amendment	CA boundary incorrect on Plan B.	Maps to be improved in submission Neighbourhood Plan
				Are the development boundaries going to be reviewed?	No change required - outside the scope of Neighbourhood Planning.
				Analysis reports missing from Evidence Base.	Noted - website updated.



#	Name	Date received	Overall response	Summary of main comments	Plan response
8	Andrew Hill	29/10/2015	Non-committal, requesting amendment	Request change of development boundary in Kinsham.	No change required - development boundaries set by strategic local plan policies and therefore outside scope of NP.
9	Sally Offord	04/12/2015	Supportive	Fully agree with content of plan.	N/A
10	Simon Offord	04/12/2015	Supportive	Fully agree with content of plan.	N/A
11	Gillian Onions	01/12/2015	Supportive	Well-reasoned and presented document (most of respondent's comments appear to relate to the Village Design Statement not the NP)	N/A
12	Terence Onions	01/12/2015	Supportive	Well-reasoned and presented document (most of respondent's comments appear to relate to the Village Design Statement not the NP)	N/A
13	Keith Plain	09/01/2016	Supportive, requesting amendment	Overall the plan is well put together and content is well thought through.	N/A
				Low questionnaire response rate suggests lack of engagement in Kinsham. The NP should ensure a sense of inclusion for all the parish villages.	Noted - already a priority for NP. Low numbers of responses largely reflects small size of Kinsham.
				Kinsham Conservative Area not reviewed since 1975.	N/A - outside the scope of Neighbourhood Planning.
				No suitable housing in Kinsham for first buyers or downsizers.	No change required - NP not covering affordable housing.
				Small number of new developments in the Kinsham would be welcome.	No change required - windfall development already possible under plan.
				Overgrown site would be better as a dwelling.	N/A - plan does not comment on individual sites
				Lower Lane road condition appalling.	N/A - outside the scope of Neighbourhood Planning
				Verges not maintained in Lower Lane.	N/A - outside the scope of Neighbourhood Planning
14	Margaret Plain	09/01/2016	Supportive, requesting amendment	Overall the plan is well put together and content is well thought through.	N/A
				Low questionnaire response rate suggests lack of engagement in Kinsham. The NP should ensure a sense of inclusion for all the parish villages.	Noted - already a priority for NP. Low numbers of responses largely reflects small size of Kinsham.
				Kinsham Conservative Area not reviewed since 1975.	N/A - outside the scope of Neighbourhood Planning.
				No suitable housing in Kinsham for first buyers or downsizers.	No change required - NP not covering affordable housing.
				Small number of new developments in the Kinsham would be welcome.	No change required - windfall development already possible under plan.
				Overgrown site would be better as a dwelling.	N/A - plan does not comment on individual sites
				Lower Lane road condition appalling.	N/A - outside the scope of Neighbourhood Planning
				Verges not maintained in Lower Lane.	N/A - outside the scope of Neighbourhood Planning

#	Name	Date received	Overall response	Summary of main comments	Plan response
15	Margaret Vernon	03/11/2015	Non-committal, requesting amendment	Extend Gap 4 northwards on west side of Tewkesbury Road.	Extend GAP4 as this appears to fit selection criteria
				CA boundary incorrect on Plan B.	Maps to be improved in submission Neighbourhood Plan
				Policy 7 - should state design must comply with Highway legislation.	No change required - taken as given
				Para 6.4 - include Village Halls, Glebe Field, Cherry Orchard play area.	No change required - already in public ownership
				Para 6.6 - should be permissive paths at end of Oak Lane.	No change required - no mechanism for delivery under Neighbourhood Planning
				Para 6.6 - more should be done to encourage cycling.	No change required - no mechanism for delivery under Neighbourhood Planning
				Policy 2 - Include view from Oak Lane to Farm Lane as key view.	No change required - less high priority than other views
				Policy 13 - Local Green Space should include land west of Oak Lane (prominent green space in CA appraisal).	No change required - does not meet selection criteria
16	Robert Vernon	03/11/2015	Non-committal, requesting amendment	Extend Gap 4 northwards on west side of Tewkesbury Road.	Extend GAP4 as this appears to fit selection criteria
				CA boundary incorrect on Plan B.	Maps to be improved in submission Neighbourhood Plan
				Policy 7 - should state design must comply with Highway legislation.	No change required - taken as given
				Para 6.4 - include Village Halls, Glebe Field, Cherry Orchard play area.	No change required - already in public ownership
				Para 6.6 - should be permissive paths at end of Oak Lane.	No change required - no mechanism for delivery under Neighbourhood Planning
				Para 6.6 - more should be done to encourage cycling.	No change required - no mechanism for delivery under Neighbourhood Planning
				Policy 2 - Include view from Oak Lane to Farm Lane as key view.	No change required - less high priority than other views
				Policy 13 - Local Green Space should include land west of Oak Lane (prominent green space in CA appraisal).	No change required - does not meet selection criteria
17	Jim Verrechia	11/11/2015	Supportive	5.13 - typos	Para 5.13 corrected
				1.4 - should this say when plan will be operational?	No change required - not known when this will be
				Policy 6 - should include Estate Agent signage?	No change required - temporary signage outside the scope of NP

## Consultations on Pre-Submission Draft on revised Pre-Submission Draft - 6 March to 17 April 2016

#	Name	Date received	Overall response	Summary of main comments	Plan response
1	Tim Cook	12/04/2016	Opposed	No landowners of LGS "were contacted at any stage for consultation which fails to follow national policy"	No change required - all registered landowners of LGS were written to, 6/3/2016.
				100 houses will be needed in Bredon by 2030 and this impossible from in-fill.	No change required - Disagree. Plan estimates delivery of 124 homes by 2016-30. Of these, 24 are allocated. Rest will be windfall ('in-fill') development. Windfalls delivered 84 homes over 9-yr period (2007-2015). Therefore reasonable to assume windfall delivery of 100 homes over 15-yr period( 2016-30), with a number of potential sites within development boundaries.
				No social housing will be attached to in-fill development.	No change required - Disagree. Affordable housing very important, but windfall development delivered approx. 11 affordable units 2007-2015. Larger windfall sites provide 40% affordable units. Oak Lane allocation will deliver 10 affordable units. Rural Exceptions Sites can be developed to meet additional affordable housing need.
				Land around the village must be designated for housing reserve area.	No change required - land for 24 houses has been allocated for housing. Plan does not contain 'housing reserve areas'.
				The NP must be rethought in its entirety.	N/A
2	Malcolm Dunn	13/04/2016	Supportive	Updated draft plan is well considered and policies make a lot of sense.	N/A
3	Derek Ebbage	27/03/2016	Supportive	Plan shows immense planning and attention to detail.	N/A
				Para 7.4 should include Bredon Cricket Club.	No change required - already belongs to community group (Bredon Playing Field is included because part of field belongs to private individual).
				Para 5.2 should include sports facilities.	Yes - amended
4	Christian Jenkins	31/03/2016	Non-committal, requesting amendment	Would like the plan to bring about investment in dedicated cycle paths.	No change required - NP is sympathetic to these aims, but neighbourhood planning lacks mechanisms to deliver dedicated cycle paths beyond the highway, as the agreement of many different landowners would be needed.
				Lack of cyclists testament to existing heavy car use.	N/A
				Lack of public transport links has led to overreliance on cars.	N/A
5	Terence Overton Short	13/03/2016	Non-committal	Asks why potential LGS area GR8 in the October 2015 consultation draft has been dropped from plan and says it will have serious implications.	No change required - GR8 does not meet updated LGS criteria.

#	Name	Date received	Overall response	Summary of main comments	Plan response
6	Madeline Reeder	10/04/2016	Unclear	Good for the parish to have significant number of new housing units.	No change required - NP forecasts delivery of 124 dwellings over the plan period. Bredon (village) village will grow by 19%. Unclear if correspondent thinks that 124 homes is significant.
				Status quo will lead to stagnation, and rhetoric should be stopped.	N/A - Unclear if correspondent is supporting the plan's delivery of 124 dwellings or if this is seen as just maintaining status quo.
7	Jennifer Stephens	17/04/2016	Supportive	Would like to endorse the plan, and believe it will benefit residents.	N/A
8	Robert Vernon	12/03/2016	Non-committal, requesting amendment	With relation to previous comments, still unhappy with accuracy of Plan B.	Maps to be improved in submission Neighbourhood Plan
				Asks why the ridge & furrow field west of Oak Lane is not included as LGS, and argues that it should qualify.	No change required - under selection criteria, land in conservation areas is excluded.
				Reference should be made to caravans in NP policies.	NP2 & NP13 amended to include caravans
9	Paul Whitehead	12/04/2016	Supportive	NP is admirable.	N/A
				2.8 - Croft Farm lakes are not technically in the floodplain.	No change required - one of lakes floods seasonally
				6.45 - incorrect use of 'propagation'.	Para 6.45 corrected.

## Appendix E: Summary of comments by landowners of LGS & LG

Landowner consultation - 6 March to 21 April 2016					
LOCAL GREEN SPACE					
#	Name	Date received	Overall response	Summary of main comments	Plan response
LGS1					
1	William & Jackie Cook	28/03/2016 & 14/4/16	Opposed	Unhappy that Parish Council would not meet them individually and unhappy with consultation process.	N/A
				Asked series of questions about LGS and what it would mean for them, and how the process had been conducted.	PC answered questions by letter on 19/4/2016.
				In response to designation, Mr & Mrs Cook would not now be allowing new access gate to the land for events from the village hall.	N/A
				Owners of LGS not consulted properly.	PC wrote to all registered landowners about LGS & LG on 6/3/2016.
2	Michael Meadows	15/04/2016	Opposed	Opposes pre-submission NP.	N/A
				Do not agree with heavy handed PC approach.	N/A
				Unhappy not to be consulted or notified contrary to NPPF.	PC wrote to all registered landowners about LGS & LG on 6/3/2016. A small amount of land, including that owned by Mr Meadows, was unregistered and PC was unable to identify ownership correctly.
LGS2					
3	Edward Cook (also in GAP1)	21/04/2016	Non-committal, requesting amendment	Strange to designate his land as both LGS and LG when Greenacres is already Local Gap.	N/A
				Proposes that additional land east of Greenacres be designated as LGS and LG.	No change required - land is already proposed as LG. With regards to LGS, agree this area provides benefit, but more for Kemerton parish than Bredon parish.
LGS3					
4	Richard Washbourne (Hunter Page)	14/04/2016	Opposed to LGS3	Historic trees now dead so does not qualify as traditional orchard.	No change required - qualifies under NE definitions.
				Inclusion of two other orchards as LGS shows that orchard is common.	No change required - only small % of traditional orchards remain.
				Not linked to other orchards and not especially beautiful. No views in.	No change required - value attested to by TPO designation.
				TPO designation already applies to site, so LGS not needed.	No change required - TPO only applies to some trees on site. Most of site unprotected.
				PC has not contacted landowner at an early stage.	PC wrote to all registered landowners about LGS & LG on 6/3/2016.
				Request removal of LGS3 from NP.	N/A

#	Name	Date received	Overall response	Summary of main comments	Plan response
LGS4					
5	Kemerton Estate (also in GAP2)	12/03/2016	Supportive	Overall supportive of plan and aims of NP2 & NP13	N/A
				No objection to inclusion of land as Local Green Space or Local Gaps	N/A
				Welcome emphasis on development inside dev. boundaries and on preserving local distinctiveness.	N/A
LGS5					
6	Kemerton Estate (also in GAP5)	12/03/2016	Supportive	Overall supportive of plan and aims of NP2 & NP13	N/A
				No objection to inclusion of land as Local Green Space or Local Gaps	N/A
				Welcome emphasis on development inside dev. boundaries and on preserving local distinctiveness.	N/A
LGS6					
7	William Dyer (also in GAP4)	11/04/2016	Opposed	Owners of LGS not consulted properly.	PC wrote to registered landowners re LGS/LG, 6/3/2016.
				Opposes LGS & LG designations and does not consider the evidence consistent with NPPF & PPG.	No change required - LGS Assessment tests derived from NPPF/PPG; LG Assessment aims to comply with NPPF/PPG.
				LGS6 considered an extensive tract of land contrary to NPPF.	No change required - 'extensive tract' not defined in NPPF/PPG. Criteria used by PC to determine areas set out in LGS/LG Assessments in Evidence Base.
				Local Gaps policy does not accord with local policy.	No change required - barrister's and consultant's advice is that it does.
				His land should be considered as a potential allocation for housing.	No change required - Appeal decision APP/H1840/A/14/2222679 confirms LGS6 an unsustainable location.
	Madelein Dyer - land owned by W Dyer (also in GAP4)	10/04/2016	Opposed	Objects to NP.	N/A
				Owners of LGS not consulted properly.	PC wrote to all registered landowners re LGS on 6/3/2016.
				LGS6 considered an extensive tract of land contrary to NPPF.	No change required - 'extensive tract' not defined in NPPF/PPG. 5ha not considered extensive according to standard dictionary definitions.
				Doubts ability of 'infill' to deliver 100 houses.	No change required - windfalls delivered 84 homes over 9-yr period (2007-2015). Therefore reasonable to assume windfall delivery of 100 homes over 15-yr period(2016-30), with number of potential sites within dev. boundaries.
				'Infill' housing would not provide sufficient affordable housing.	No change required - affordable housing very important, but windfall development delivered approx. 11 affordable units 2007-2015. Larger windfall sites provide 40% affordable units. Oak Lane allocation will deliver 10 affordable units. Rural Exceptions Sites can be developed to meet additional affordable housing need.
	Natalya Dyer - land owned by W Dyer (also in GAP4)	14/04/2016	Opposed to LGS/LG	LGS/LG has been distributed unevenly, greater clarity needed.	No change required - methodology set out in Assessment of LGS in Evidence Base.
				There is a housing shortage in Bredon.	No change required - NP follows strategic housing allocation of SWDP adopted in Feb 2016, which according to SWDP Inspector meet identified need.

#	Name	Date received	Overall response	Summary of main comments	Plan response
	/cont.			Young people are priced out of market in Bredon.	No change required - affordable housing very important, but windfall development delivered approx. 11 affordable units 2007-2015. Larger windfall sites provide 40% affordable units. Oak Lane allocation will deliver 10 affordable units. Rural Exceptions Sites can be developed to meet additional affordable housing need.
				Assignment of LGS / LG currently unacceptable.	N/A
	Gladman Developments - land owned by W Dyer (also in GAP4)	15/04/2016	Opposed	Submission for site to be considered as a housing allocation to meet identified need, and put forward its site as a secondary reserve site.	No change required - NP follows strategic housing allocation of SWDP adopted in Feb 2016, which according to SWDP Inspector meet identified need.
				In order for NP to meet all neighbourhood plan basic conditions it is advised that a more flexible approach to plan preparation is required in order to ensure that the NP is able to respond to sustainable development proposals.	No change required - barrister's advice is that plan is compliant with policy and regulations.
				In its current form, the BNP sets out an overly restrictive approach through a series of policies which include a tightly defined settlement boundary, extensive LGS and Local Gap designations.	No change required - development boundary an SWDP policy. LGS not extensive. Local Gap policy appropriate.
				Bredon has been allocated lowest growth for Category 1 settlements despite being more sustainable.	No change required - Evidence presented to APP/H1840/A/14/2222679 confirms Bredon growth under SWDP, compared to other Category 1 villages, is commensurate with size of village.
				Census data shows population will decline.	No change required - claim not supported by census data in Evidence Base.
				NP1 - recommends replacement wording allowing development adjacent to existing settlement boundaries.	No change required - proposed wording would not conform with strategic policies of SWDP - particularly SWDP 2 which strictly controls development beyond development boundaries.
				NP2 - Local Gaps are strategic policies that can only be confirmed in Local Plan. Object to inclusion of GAP4: coalescence would not occur as appropriate buffer is provided by the M5.	No change required - 'Strategic Gaps' fall under SWDP strategic policy - but Local Gaps are different and do not fall under strategic policy. M5 contributes to built coalescence, rather than preventing it.
				NP2 Key Views - not clear where views are located; show in Policies Map.	Maps to be updated in submission Neighbourhood Plan.
				NP2 Key Views - not criteria based as required by NPPF 113.	Noted. However NPPF 113 applies only to Local Planning Authority. NP2 amended to clarify criteria underpinning this policy.
				NP3 - some provisions not design policies.	Amend title NP3 to 'Siting & Design of New Buildings'.
				NP9 - needs to make clear this applies only to non-designated heritage assets.	Amend Policy NP9.
				NP13 - the designation of Gladman land at LGS6 fails to meet 3 NPPF 77 tests, considered an extensive tract. Recommend NP13 be deleted in its entirety.	No change required - barrister considers policy complies with policy and guidance.
				PC has not contacted landowner at an early stage.	PC wrote to registered landowners re LGS/LG, 6/3/2016.

#	Name	Date received	Overall response	Summary of main comments	Plan response
<b>LGS7</b>					
8	Veronica Bridge (also in GAP3)	10/04/2016	Opposed to LGS7	Concerned that only a quarter of households responded to NP survey.	N/A
				70% of respondents do not use recreational facilities.	No change required - not correct: a large majority reported using recreational facilities.
				Doubts ability of 'infill' to deliver 100 houses.	No change required - windfalls delivered 84 homes over 9-yr period (2007-2015). Therefore reasonable to assume windfall delivery of 100 homes over 15-yr period( 2016-30), with a number of potential sites within development boundaries.
				Does not agree that traditional orchards are visually/culturally important.	No change required - Natural England NCA profile highlights importance.
				House prices are not affordable. Future developments should have 40% affordable housing with priority for people with local connection.	No change required - agree with sentiment, however affordable housing policies dealt with by SWDP and national policy.
				If Wychavon has a housing shortfall, homes should be built at Bensham.	No change required - Appeal decision APP/H1840/A/14/2217607 confirmed this to be an unsuitable site for development.
9	Mrs J & Mr S Donnelly (also in GAP3)	Undated	Opposed to LGS7	Housing forecast under the plan is all provided by windfall with no provision for social housing.	No change required - plan estimates delivery of 124 homes by 2016-30. Of these, 24 are allocated. Rest will be windfall ('in-fill') development. Windfalls delivered approx. 11 affordable units 2007-2015. Larger windfall sites provide 40% affordable units. Oak Lane allocation will deliver 10 affordable units. Rural Exceptions Sites can be developed to meet additional affordable housing need.
				Bredon becoming a retirement haven and the school will decline due to not enough housing for younger people.	No change required - not supported by Bredon Ward Profile Statistics (ONS 2011 dataset). These show that 0-15 age group is higher than both Wychavon and Worcs averages.
				Object to inclusion of their land in LGS7 & GAP3.	N/A
				Should have been notified earlier of inclusion of their land.	PC agreed to include LGS7 at meeting of 29/2/2016. Landowners were written to as soon as possible after this on 6/3/2016.
				Majority of LGS7 not used as allotments; owners should be not be dictated to by national and local authorities.	N/A
				Key Views "Views into Bensham Allotments" should say "Views along Bensham".	Meaning not clear



#	Name	Date received	Overall response	Summary of main comments	Plan response
10	Robert Drew (also in GAP3)	18/03/2016	Opposed to LGS7	Local Gaps ring fence Bredon with a 'blanket'.	No change required
				No developer has yet come forward to take on Oak Lane allocation.	N/A
				Area of Bensham Allotments should be considered 'in fill'.	No change required - this is outside development boundary and therefore open countryside, not infill.
				A nonsense that parts of Bensham can be considered traditional orchard. TPO considered farcical.	No change required - Appeal inspector for APP/H1840/A/14/2217607 confirmed that significant parts of LGS7 constituted traditional orchard.
				Considers that LGS effectively ring-fences Bredon with a 'blanket of LGS'.	No change required - only small percentage of development boundary perimeter adjacent to LGS.
				Survey in App 5 shows that 62% didn't think loss of open countryside was a negative feature.	No change required - statement not correct. Only 3 respondents out of 205 considered loss of countryside 'no longer negative / improving'.
				Cannot understand that dead/dying trees at Bensham is Key View.	No change required - Appeal decision APP/H1840/A/14/2217607 ascribed landscape value to site.
				LGS / LG inappropriate for Bensham Allotments.	No change required - detailed justification in LGS/LG Assessments.
11	Kemerton Estate (also in GAP3)	12/03/2016	Supportive	Overall supportive of plan and aims of NP2 & NP13	N/A
				No objection to inclusion of land as Local Green Space or Local Gaps	N/A
				Welcome emphasis on development inside development boundaries and on preserving local distinctiveness.	N/A
12	Brian Walker (also in GAP3)	14/04/2016	Opposed to LGS7	House prices are not affordable. Future developments should have 40% affordable housing with priority for people with local connection.	No change required - agree with sentiment, however affordable housing policies dealt with by SWDP and national policy.
				View of LGS7 not beautiful.	No change required - Appeal decision APP/H1840/A/14/2217607 considered Bensham valued visual amenity.
				"Views of Bensham are advertised as being able to see Bredon Church".	Meaning not clear. NP does not make this claim.
				Concerned that only a quarter of households responded to NP survey.	N/A
				If Wychavon has a housing shortfall, homes should be built at Bensham.	No change required - Appeal decision APP/H1840/A/14/2217607 found this to be an unsuitable site for development.

#	Name	Date received	Overall response	Summary of main comments	Plan response
<b>LGS9</b>					
13	Croft Farm Water Park (Martin Newell) (also in GAP5)	17/04/2016	Opposed to LGS9	Landowner should be in control of his own land and what development should take place	No change required.
				Consultation should have taken place prior to land designation.	No change required - PC agreed to include LGS7 at meeting of 29/2/2016. Landowners were written to as soon as possible after this on 6/3/2016.
				LGS fails to meet all three tests in NPPF.	No change required - LGS Assessment considered compliant with NPPF tests.
				Unpaid public access to LGS9 not allowed therefore no public benefit.	No change required - public ownership or access not required for LGS.
				LGS will be barrier to owner's proposal to build house.	N/A
14	Alan Newell (also in GAP5)	17/04/2016	Opposed	PC has acted in a high handed manner in not having contacted owner to discuss its proposals at an earlier date	No change required - PC agreed to include LGS7 at meeting of 29/2/2016. Landowners were written to as soon as possible after this on 6/3/2016.
				NP, as currently prepared, has not had sufficient regard to the relevant statements set out in the NPPF.	No change required - NP follows strategic policies of SWDP which determine issues such as development need.
				NP does not seek to proactively encourage business and employment opportunities	No change required - NP11 and NP12 seek to support business and employment.
				NP does not reference SWDP 12 Employment in Rural Areas.	Amend Policy NP12 to include reference.
				SWDP 36 is ignored by the NP. Detail from it should be incorporated.	No change required - NP sits alongside SWDP. No need to duplicate policies.
				LGS9 should not be designated because privately owned.	No change required - Private ownership is not a relevant factor in NPPF/PPG.
				LGS9 does not directly serve the community.	No change required - In terms of NPPF 77 it can be considered in reasonably close proximity to the community which it serves regarding the benefits it provides.
				LGS9 should not be LGS as it has no particular beauty and no public recreational value.	No change required – noted that Croft Farm promotional material states "set in the wonderful Gloucestershire countryside... the sunset over the Malverns is spell-binding", etc.
				Scale of the identified Gaps 3, 4 and 5 appears to be excessive	No change required - Detailed justification in LG Assessment.

LOCAL GAPS					
#	Name	Date received	Overall response	Summary of main comments	Plan response
<b>GAP1</b>					
1	Edward Cook (also in LGS2)	21/04/2016	Non-committal, requesting amendment	Strange to designate his land as both LGS and LG when Greenacres is already Local Gap. Proposes that additional land east of Greenacres be designated as LGS and LG.	N/A No change required - land is already proposed as LG. With regards to LGS, agree this area provides benefit, but more for Kemerton parish than Bredon parish.
2	Matthew Darby	12/03/2016	Supportive	Overall supportive of plan and aims of NP2 & NP13 No objection to inclusion of land as Local Green Space or Local Gaps Welcome emphasis on development inside dev. boundaries and on preserving local distinctiveness.	N/A N/A N/A
3	Kemerton Estate	12/03/2016	Supportive	Overall supportive of plan and aims of NP2 & NP13 No objection to inclusion of land as LGS / LG Welcome emphasis on development inside dev. boundaries and on preserving local distinctiveness.	N/A N/A N/A
<b>GAP2</b>					
4	Kemerton Estate (also in LGS4 & LGS5)	12/03/2016	Supportive	Overall supportive of plan and aims of NP2 & NP13 No objection to inclusion of land as LGS / LG Welcome emphasis on development inside dev. boundaries and on preserving local distinctiveness.	N/A N/A N/A
<b>GAP3</b>					
5	Veronica Bridge (also in LGS7)	10/04/2016	Opposed to GAP3	Concerned that only a quarter of households responded to NP survey. 70% of respondents do not use recreational facilities. Doubts ability of 'infill' to deliver 100 houses. Does not agree that traditional orchards are visually/culturally important. House prices are not affordable. Future developments should have 40% affordable housing with priority for people with local connection. If Wychavon has a housing shortfall, homes should be built at Bensham.	N/A No change required - not correct: a large majority reported using recreational facilities. No change required - windfalls delivered 84 homes over 9-yr period (2007-2015). Therefore reasonable to assume windfall delivery of 100 homes over 15-yr period (2016-30), with a number of potential sites within development boundaries. No change required - Natural England NCA profile highlights importance. No change required - agree with sentiment, however affordable housing policies dealt with by SWDP and national policy. No change required - Appeal decision APP/H1840/A/14/2217607 confirmed this to be an unsuitable site for development.

#	Name	Date received	Overall response	Summary of main comments	Plan response
6	Mrs J & Mr S Donnelly (also in LGS7)	Undated	Opposed to GAP3	Housing forecast under the plan is all provided by windfall with no provision for social housing.	No change required - plan estimates delivery of 124 homes by 2016-30. Of these, 24 are allocated. Rest will be windfall ('in-fill') development. Windfalls delivered approx. 11 affordable units 2007-2015. Larger windfall sites provide 40% affordable units. Oak Lane allocation will deliver 10 affordable units. Rural Exceptions Sites can be developed to meet additional affordable housing need.
				Bredon becoming a retirement haven and the school will decline due to not enough housing for younger people.	No change required - not supported by Bredon Ward Profile Statistics (ONS 2011 dataset). These show that 0-15 age group is higher than both Wychavon and Worcs averages.
				Object to inclusion of their land in LGS7 & GAP3.	N/A
				Should have been notified earlier of inclusion of their land.	PC agreed to include LGS7 at meeting of 29/2/2016. Landowners were written to as soon as possible after this on 6/3/2016.
				Majority of LGS7 not used as allotments; owners should be not be dictated to by national and local authorities.	N/A
				Key Views "Views into Bensham Allotments" should say "Views along Bensham".	Meaning not clear
7	Robert Drew (also in LGS7)	18/03/2016	Opposed to GAP3	Local Gaps ring fence Bredon with a 'blanket'.	No change required
				No developer has yet come forward to take on Oak Lane allocation.	N/A
				Area of Bensham Allotments should be considered 'in fill'.	No change required - this is outside development boundary and therefore open countryside, not infill.
				A nonsense that parts of Bensham can be considered traditional orchard. TPO considered farcical.	No change required - Appeal inspector for APP/H1840/A/14/2217607 confirmed that significant parts of LGS7 constituted traditional orchard.
				Considers that LGS effectively ring-fences Bredon with a 'blanket of LGS'.	No change required - only small percentage of development boundary perimeter adjacent to LGS.
				Survey in App 5 shows that 62% didn't think loss of open countryside was a negative feature.	No change required - statement not correct. Only 3 respondents out of 205 considered loss of countryside 'no longer negative / improving'.
				Cannot understand that dead/dying trees at Bensham is Key View.	No change required - Appeal decision APP/H1840/A/14/2217607 ascribed landscape value to site.
				LGS / LG inappropriate for Bensham Allotments.	No change required - detailed justification in LGS/LG Assessments.
8	Kemerton Estate (also in LGS7)	12/03/2016	Supportive	Overall supportive of plan and aims of NP2 & NP13	N/A
				No objection to inclusion of land as LGS / LG.	N/A
				Welcome emphasis on development inside dev. boundaries and on preserving local distinctiveness.	N/A

#	Name	Date received	Overall response	Summary of main comments	Plan response
9	Brian Walker (also in LGS7)	14/04/2016	Opposed to GAP3	House prices are not affordable. Future developments should have 40% affordable housing with priority for people with local connection.	No change required - agree with sentiment, however affordable housing policies dealt with by SWDP and national policy.
				View of LGS7 not beautiful.	No change required - Appeal decision APP/H1840/A/14/2217607 considered Bensham valued visual amenity.
				"Views of Bensham are advertised as being able to see Bredon Church".	Meaning not clear. NP does not make this claim.
				Concerned that only a quarter of households responded to NP survey.	N/A
				If Wychavon has a housing shortfall, homes should be built at Bensham.	No change required - Appeal decision APP/H1840/A/14/2217607 found this to be an unsuitable site for dev.
GAP4					
10	William Dyer (also in LGS6)	11/04/2016	Opposed	Owners of LGS not consulted properly.	PC wrote to all registered landowners about LGS & LG on 6/3/2016.
				Opposes LGS & LG designations and does not consider the evidence consistent with NPPF &PPG.	No change required - LGS Assessment tests derived from NPPF/PPG; LG Assessment aims to comply with NPPF/PPG.
				LGS6 considered an extensive tract of land contrary to NPPF.	No change required - 'extensive tract' not defined in NPPF/PPG. Criteria used by PC to determine areas set out in LGS/LG Assessments in Evidence Base.
				Local Gaps policy does not accord with local policy.	No change required - barrister's and consultant's advice is that it does.
				His land should be considered as a potential allocation for housing.	No change required - Appeal decision APP/H1840/A/14/2222679 confirms LGS6 an unsustainable location for dev.
	Madelein Dyer - land owned by W Dyer (also in LGS6)	10/04/2016	Opposed	Objects to NP.	N/A
				Owners of LGS not consulted properly.	PC wrote to registered landowners re LGS/LG, 6/3/2016.
				LGS6 considered an extensive tract of land contrary to NPPF.	No change required - 'extensive tract' not defined in NPPF/PPG. 5ha not considered extensive according to standard dictionary definitions.
				Doubts ability of 'infill' to deliver 100 houses.	No change required - windfalls delivered 84 homes over 9-yr period (2007-2015). Therefore reasonable to assume windfall delivery of 100 homes over 15-yr period( 2016-30), with a number of potential sites within development boundaries.
				'Infill' housing would not provide sufficient affordable housing.	No change required - affordable housing very important, but windfall development delivered approx. 11 affordable units 2007-2015. Larger windfall sites provide 40% affordable units. Oak Lane allocation will deliver 10 affordable units. Rural Exceptions Sites can be developed to meet additional affordable housing need.
	Natalya Dyer - land owned by W Dyer (also in LGS6)	11/04/2016	Opposed to LGS/LG	LGS/LG has been distributed unevenly, greater clarity needed.	No change required - methodology set out in Assessment of LGS in Evidence Base.
				There is a housing shortage in Bredon.	No change required - NP follows strategic housing allocation of SWDP adopted in Feb 2016, which according to SWDP Inspector meet identified need.

#	Name	Date received	Overall response	Summary of main comments	Plan response
	/cont.			Young people are priced out of market in Bredon.	No change required - affordable housing very important, but windfall development delivered approx. 11 affordable units 2007-2015. Larger windfall sites provide 40% affordable units. Oak Lane allocation will deliver 10 affordable units. Rural Exceptions Sites can be developed to meet additional affordable housing need.
				Assignment of LGS / LG currently unacceptable.	N/A
	Gladman Developments - land owned by W Dyer (also in LGS6)	15/04/2016	Opposed	Submission for site to be considered as a housing allocation to meet identified need, and put forward its site as a secondary reserve site.	No change required - SWDP adopted in Feb 2016 meets identified need.
				In order for NP to meet all neighbourhood plan basic conditions it is advised that a more flexible approach to plan preparation is required in order to ensure that the NP is able to respond to sustainable development proposals.	No change required - barrister's advice is that plan is compliant with policy and regulations.
				In its current form, the BNP sets out an overly restrictive approach through a series of policies which include a tightly defined settlement boundary, extensive LGS and Local Gap designations.	No change required - development boundary an SWDP policy. LGS not extensive. Local Gap policy appropriate.
				Bredon has been allocated lowest growth for Category 1 settlements despite being more sustainable.	No change required - Evidence presented to APP/H1840/A/14/2222679 confirms Bredon growth under SWDP, compared to other Category 1 villages, is commensurate with size of village.
				Census data shows population will decline.	No change required - claim not supported by census data in Evidence Base.
				NP1 - recommends replacement wording allowing development adjacent to existing settlement boundaries.	No change required - proposed amendment does not conform with strategic policies of SWDP - particularly SWDP 2 which strictly controls development beyond development boundaries.
				NP2 - Local Gaps are strategic policies that can only be confirmed in Local Plan. Object to inclusion of GAP4: coalescence would not occur as appropriate buffer is provided by the M5.	No change required - 'Strategic Gaps' fall under SWDP strategic policy - but Local Gaps are different and do not fall under strategic policy. M5 contributes to built coalescence, rather than preventing it.
				NP2 Key Views - not clear where views are located; show in Policies Map.	Maps to be updated in submission Neighbourhood Plan.
				NP2 Key Views - not criteria based as required by NPPF 113.	Noted. However NPPF 113 applies only to Local Planning Authority. NP2 amended to clarify criteria underpinning this policy.
				NP3 - some provisions not design policies.	Amend title NP3 to 'Siting & Design of New Buildings'.
				NP9 - needs to make clear this applies only to non-designated heritage assets.	Amend Policy NP9.
				NP13 - the designation of Gladman land at LGS6 fails to meet 3 NPPF 77 tests, considered an extensive tract. Recommend NP13 be deleted in its entirety.	No change required - barrister considers policy complies with policy and guidance.
				PC has not contacted landowner at an early stage.	PC wrote to registered landowners re LGS/LG, 6/3/2016.

#	Name	Date received	Overall response	Summary of main comments	Plan response
11	Joseph Evans (Pam McConnell)	29/03/2016	Non-committal	Owner wouldn't want any changes to his orchard or the access.	N/A
12	Mr M & Mrs P Pullin (unregistered owners of land within GAP4?)	14/04/2016	Opposed	Opposes pre-submission consultation.	N/A
				As landowner of LGS & LG disappointed not to be notified contrary to NPPF.	PC wrote to all registered landowners about LGS & LG on 6/3/2016. A small amount of land was unregistered whose owners PC was unable to identify correctly.
				Bredon will need more houses and doubts delivery through 'infill'.	No change required - plan estimates delivery of 124 homes by 2016-30. Of these, 24 are allocated. Rest will be windfall ('in-fill') development. Windfalls delivered 84 homes over 9-yr period (2007-2015). Therefore reasonable to assume windfall delivery of 100 homes over 15-yr period( 2016-30), with a number of potential sites within development boundaries.
GAP5					
13	Barratt Developments PLC (RPS)	16/04/2016	Opposed to GAP5	Encouraging to see a level of detail within this Plan.	N/A
				Have a number of concerns with approach requiring amendment.	N/A
				NP1 - plan does not explicitly identify development boundaries for settlements and as such, PC's intentions in this regard remain uncertain.	Maps to be updated - development boundaries to be shown on SWDP inset maps.
				NP2 - SWDP contains footnote regarding Land at Mitton. A potential conflict therefore exists between NP2 and higher tier strategic polices in SWDP.	Amend NP1 to make clear that strategic policies of local plan will be supported throughout parish. Amend NP2 to exclude SWDP allocations.
				Recommended that Land at Mitton be removed from GAP5 due to conflict.	No change required - Consider other amendments resolve potential conflict with SWDP.
				NP2 - policy conflates coalescence and landscape character.	Amend detailed justification of NP2 to make distinction clear.
				LG Assessment - unclear how many sites the Parish Council has appraised as part of this assessment.	Amend LG Assessment to make clear screening of other sites has occurred.
				LG Assessment - 1000m limit arbitrary.	Amend LG Assessment to remove arbitrary limit.
				LG Assessment Test 3 - separate features conflated in one indicator.	Amend LG Assessment to clarify.
				LG Assessment - Test 4 - unclear indicator differs from Test 3.	Amend LG Assessment to clarify.
14	Croft Farm Water Park (Martin Newell) (also in LGS9)	17/04/2016	No comment on LG	landowner should be in control of his own land and what development should take place	No change required.
15	Croome Estate Trustees / Mactaggart & Mickel (Carter Jonas)	16/04/2016	Opposed to GAP5	Do not support GAP5 as a matter of principle.	N/A
				References to policies to superseded WDLP and maps need to be updated.	Corrected throughout.
				Argue that NP policies seeking to restrict opportunity for development at Mitton is premature because land may be needed for future housing needs of Wychavon or Tewkesbury Borough.	No change required - of itself, this argument could be applied to any NP policy anywhere. Mitton falls under possible future strategic allocations of SWDP, which NP explicitly complies with in NP1.

#	Name	Date received	Overall response	Summary of main comments	Plan response
	/cont.			NP1 - should make reference to the provisions set out in SWDP, which provide for the land at Mitton to come forward in defined circumstances.	Amend NP1 to make clear that strategic policies of local plan will be supported throughout parish. Amend NP2 to exclude SWDP allocations.
				Councils or SWDP Inspector could have sought to introduce a Significant Gap between Tewkesbury and Bredon's Hardwick, and decision not to is telling.	No change required - SWDP 2 Reasoned Justification 8 makes clear that Significant Gaps are between rural settlements and adjacent urban areas defined in policy as Worcester, Droitwich Spa, Evesham, Malvern, Pershore, Tenbury Wells and Upton (but not Tewkesbury).
16	John, Peter & Samantha Mitchell (Hunter Page)	11/04/2016	Opposed to NP2	NP2 - not supported by NPPF which does not make any reference to purpose of identifying Local Gaps through NPs. Policy should be deleted.	No change required - NPPF not intended to provide detail at this level and would not be expected to mention Local Gaps. SWDP contains policy on 'significant gaps', which are not mentioned in NPPF either, yet SWDP found sound at EiP.
				GAP5 not identified within SWDP, nor any provisions in SWDP for designation.	No change required - SWDP 2 Reasoned Justification 8 makes clear that Significant Gaps are between rural settlements and adjacent urban areas defined in policy as Worcester, Droitwich Spa, Evesham, Malvern, Pershore, Tenbury Wells and Upton (but not Tewkesbury).
				GAP5 unnecessary in meeting the stated objectives of NP2.	No change required - if Significant Gaps policy is sound despite existence of other provisions of SWDP 2, then Local Gaps policy can be justified on same basis.
				GAP5 Fails 3 of 4 tests in LG Assessment.	Amend LG Assessment to clarify.
				GAP5 unnecessarily adds additional layer of planning restrictions that would obstruct sustainable economic growth of farm enterprise.	No change required - GAP5 serves important purpose.
17	Alan Newell (also in LGS9)	17/04/2016	Opposed	PC has acted in a high handed manner in not having contacted owner to discuss its proposals at an earlier date	No change required - PC agreed to include LGS7 at meeting of 29/2/2016. Landowners were written to as soon as possible after this on 6/3/2016.
				NP has not had sufficient regard to the relevant statements set out in the NPPF.	No change required - NP aims to be compliant with NPPF & PPG. Barrister & consultant advise it is compliant.
				NP does not seek to proactively encourage business and employment opportunities	No change required - NP11 and NP12 seek to support business and employment.
				NP does not reference SWDP 12 Employment in Rural Areas.	Amend Policy NP12 to include reference.
				SWDP 36 is ignored by the NP. Detail from it should be incorporated.	No change required - NP sits alongside SWDP. No need to duplicate policies.
				LGS9 should not be designated because privately owned.	No change required - Private ownership is not a relevant factor in NPPF/PPG.
				LGS9 does not directly serve the community.	No change required - In terms of NPPF 77, the visual and other benefits it provides serve the community.
				LGS9 should not be LGS as it has no particular beauty and no public recreational value.	No change required - Croft Farm promotional material says "set in the wonderful Gloucestershire countryside... the sunset over the Malverns is spellbinding", etc.
				Scale of Gaps 3, 4 and 5 appears to be excessive .	No change required – selection criteria in LG Assessment.



**Appendix F: Full versions of all comments by consultees**

**Part 1. Statutory consultation bodies ..... 56**

**Part 2. Local residents & stakeholders..... 102**

**Part 3. Landowners & their representatives..... 125**

## **Part 1. Statutory consultation bodies**

Arranged alphabetically

**From:** Debra Lincoln [<mailto:debs@bredon-it.demon.co.uk>]  
**Sent:** 30 January 2016 22:18  
**To:** [bredonpc@btconnect.com](mailto:bredonpc@btconnect.com)  
**Subject:** FW: Bredon Parish Neighbourhood Plan consultation

Dear Jackie,

BCPR Committee met on Tues 26<sup>th</sup> January. We are supportive of comments already received personally from Malcolm Dunn and additionally we have the following comments to make:

1. At 61 pages long, it is a detailed document that a lot of thought has clearly gone into. We have focused on the elements of the report that relate to the Playing Fields.
2. The Public Consultation Survey clearly was a worthwhile exercise and we are grateful for the time & effort taken to collect this data. We are delighted with the positive statistics with regards to the playing fields. They endorse the approach and work of BCPR to date and confirm that both the use and value of the playing fields is high and increasing.
3. With 37% of respondents never using the playing fields, there is still an opportunity to understand how the facility can be enhanced to cater for more in the community. It is important to BCPR that the playing fields are protected, however it is just as important to have the mechanisms in place to be able to adapt and update to keep the amenity fresh and relevant to the times. We agree with the vision for recreation facilities to be flourishing and easy to access. We agree with the objective to maintain and enhance the playing fields.
4. Within Policy 10, we would like recognition that improvements will be encouraged by continued working with local groups, clubs etc. and consulting more widely
5. Within Policy 13, it is assumed that 'new development will not be permitted' refers to housing and not to any potential new amenity that may be proposed as would come under 5.40

Thank you for extending the deadline for replies to allow us to respond.

Regards.....Debs

Debra Lincoln on behalf of BCPR

**From:** Andrew Lord [<mailto:Andrew.Lord@cotswoldsaonb.org.uk>]  
**Sent:** 16 November 2015 10:26  
**To:** [bredonpc@btconnect.com](mailto:bredonpc@btconnect.com)  
**Subject:** Bredon Parish Pre-Submission Neighbourhood Plan Consultation

For the Parish Clerk:

**Bredon Parish Pre-Submission Neighbourhood Plan Consultation.**

Thank you for consulting the Cotswolds Conservation Board on the consultation of the Bredon Neighbourhood Plan.

To assist I attach the Board's recently adopted Position Statement on the preparation of Neighbourhood Plans.

The Board is pleased to see the detailed comments in respect of the landscape, the AONB and its ecological and heritage assets and its setting within the Plan.

The Board recommends the inclusion of reference to Paragraphs 115 and 116 of the NPPF (at paragraph 3.2 of the Neighbourhood Plan) as these relate specifically to the AONB.

I hope the above is of assistance.

With thanks

Andrew Lord  
MA BA (Hons) MRTPI

Planning and Landscape Officer

Cotswolds Conservation Board  
The Old Prison  
Fosse Way  
Northleach  
Gloucestershire  
GL54 3JH

Direct Dial : 01451 862004



Bredon Parish Council  
Bredon Village Hall  
Main Road  
Bredon  
Tewkesbury  
GL20 7QN

**Our ref:** SV/2010/104075/OT-  
06/PO1-L01

**Date:** 03 December 2015

Dear Sir/Madam

**Consultation on the pre-submission draft of the Bredon Parish Neighbourhood Plan (2015-2030)**

Thank you for referring the above consultation on the draft Bredon Parish Neighbourhood Plan.

We sent a copy of our Neighbourhood Plan pro-forma guidance to the planning policy team at Wychavon District Council on 25 November 2015, for distribution to Parish Councils (as enclosed). The purpose of the guidance is to assist the preparation of Neighbourhood Development Plans, including an appropriate evidence base. This includes consideration of some of the relevant environmental issues that should be considered, including flood risk (from rivers and sea), water quality, water resources and includes latest Climate Change recommendations for flood risk.

For each proposed site allocation, we recommend completing the pro-forma to check the environmental constraints. This will help collect evidence, identify challenges, inform policy and assist delivery of sustainable solutions.

We note there are no additional site allocations proposed within your Plan. We would only make substantive further comments on the plan if you were seeking to allocate sites in Flood Zones 2 or 3 (the latter being used as the 100 year climate change extent). Furthermore, we do not offer detailed bespoke advice on policy but advise you ensure conformity with the Local Plan and refer to our guidance. This might assist with your consideration of a local environmental enhancements or improvement policies that may be necessary.

I trust that the above is of use to you at this time.

Yours faithfully

**Mrs Tessa Jones**  
**Senior Planning Advisor**

Direct dial 02030 251700

Direct e-mail [tessa.jones@environment-agency.gov.uk](mailto:tessa.jones@environment-agency.gov.uk)

Environment Agency

Newtown Industrial Estate (Riversmeet House) Northway Lane, Tewkesbury, Gloucestershire, GL20 8JG.

End

Bredon Parish Neighbourhood Plan: Consultation Statement, May 2016

**From:** Jones, Tessa R [<mailto:tessa.jones@environment-agency.gov.uk>]  
**Sent:** 07 March 2016 16:00  
**To:** [bredonpc@btconnect.com](mailto:bredonpc@btconnect.com)  
**Subject:** RE: Bredon Parish Neighbourhood Plan consultation (6 Mar to 17 Apr 2016)

Dear Sir/Madam,

Thank you for consulting us on the Pre-submission Draft of the Bredon Parish Neighbourhood Plan (March 2016).

At this time we would refer to the comments made within our letter dated 3 December 2015 (reference SV/2010/104075/OT-06/PO1-L01), as attached.

I trust that the above confirms our position at this time.

Kind regards,

**Tessa Jones**

*Planning Advisor  
Sustainable Places  
Environment Agency - Shropshire, Herefordshire, Worcestershire and Gloucestershire Area*



722 4381 (Jabber - 51700) / 02030251700



[tessa.jones@environment-agency.gov.uk](mailto:tessa.jones@environment-agency.gov.uk)



Riversmeet House, Northway Lane, Tewkesbury, Gloucestershire, GL20 8JG

Please note: the Environment Agency have updated their climate change allowances for planners. See [Flood risk assessments: climate change allowances](#).

**From:** NIBLETT, Robert [<mailto:Robert.NIBLETT@gloucestershire.gov.uk>]  
**Sent:** 04 April 2016 16:53  
**To:** 'bredonpc@btconnect.com'  
**Subject:** Bredon Parish Neighbourhood Plan consultation (6 Mar to 17 Apr 2016)

Dear Ms Shields

Thank you for consulting Gloucestershire County Council on the above matter. The only officer comments I have received relate to ecology:

Under Natural Environment the plan might want to also mention that the parish adjoins a further SSSI which is in Gloucestershire the other side of the River Severn (Upham Meadow & Summer Leasow SSSI). The foreground of the photograph that is Figure 3 shows land within this SSSI which is partially flooded. Policy NP14 (landscape & Biodiversity) is appropriate and welcomed for a parish adjacent to Gloucestershire border.

Thank you.

Rob Niblett  
Planning Officer



Historic England

Bredon NP  
c/o Bredon Parish Clerk  
Ms Jacqueline Shields  
Bredon Village Hall  
Bredon  
Tewkesbury  
GL20 7QN

Our ref: 1583

Your ref:

Telephone  
0121 256887

01 December 2015

Dear Sirs

### **BREDON DRAFT NEIGHBOURHOOD PLAN – CONSULTATION**

Thank you for the invitation to comment on the Bredon Draft Neighbourhood Plan and Historic England are supportive of the content of the document, particularly its' emphasis on the heritage of the Parish and local distinctiveness. We also highly commend the approaches taken in the Plan to the conservation of the historic environment and consider it to be a well-considered, concise and fit for purpose document.

We do, however, have some relatively minor comments that we hope will be helpful in strengthening the Plan.

Regarding Policy 2: "Local Gaps & Key Views" for ease of reference and the avoidance of any doubt we would suggest clearly identifying the key views as arrowed sight lines on a map of the Parish.

Policy 3: "Design of New Buildings" is commendably comprehensive but it would in our view be strengthened by the introduction of a policy requirement for developers to demonstrate that they have used the Village Design Statement et al when formulating their proposals. This could be achieved by rewording point 1 of the policy thus:

*"conserve the special local and historic character of the parish and can demonstrate that they have taken full account of the Bredon Village Design Statement (2011) and relevant Conservation Area Appraisals;"*



Historic England, 8<sup>th</sup> Floor, The Axis, 10 Holliday Street, Birmingham B1 1TG

Telephone 0121 625 6870 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.

Bredon Parish Neighbourhood Plan: Consultation Statement, May 2016





Given the wealth of archaeological remains already identified within the Parish it would also be appropriate to introduce a new point 10 to Policy 3 to read:

*“take account of known surface and sub-surface archaeology and ensure unknown and potentially significant deposits are identified and appropriately considered during development after consultation with the Worcestershire Historic Environment Record (HER). Lack of current evidence of sub-surface archaeology must not be taken as proof of absence”.*

Policy 4: “Design of Extensions” is also commendably wide ranging but we are not clear as to the use of the term “design breaks” in policy point 9. We are unsure what these are (a “setback” perhaps?). Would it perhaps be appropriate to explain the term in, for example, a footnote?

In relation to Policy 5: “Design of Alterations & Conversions” we note that the Parish hosts a number of historic farmsteads. Such complexes, often threatened with redundancy, are highly sensitive to proposals to alter or convert and we, therefore, suggest adding a new point 7 to the Policy to read:

*“Redevelopment, alteration or extension of historic farmsteads and agricultural buildings within the Parish should be sensitive to their distinctive character, materials and form. Due reference and consideration should be made to the Worcestershire Farmstead Assessment Framework”.*

(Reference: Lake, J. (Ed.). (2014) Worcestershire Farmstead Assessment Framework. English Heritage & Worcestershire Archive and Archaeology Service, Worcester).

Whilst we are extremely supportive of the proposal to locally list buildings and structures as set out in Policy 9 we must point out that Parishes cannot themselves “designate” such assets. The NPPF makes it clear that this is the province of local planning authorities so a slight rewording is indicated so as to replace the word “designates” with “identifies” throughout, for instance thus:

*“The Neighbourhood Plan identifies buildings and structures for special protection in recognition of their significance and the important contribution they make to the special character of the parish and also commends them to Wychavon Council for inclusion in the Local List. The full schedule of buildings and structures with the reasons for selection is contained in Appendix 3”.*

The deposition of the list and schedule with the Worcestershire Historic Environment Record (HER) held by the County Council and their entry into that formal register will additionally have the immediate effect of making them a “material consideration” in planning terms, so this would be a very useful interim step.



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Correspondence or information which you send us may therefore become publicly available.



I hope you find these comments and advice helpful. If you have any queries please do not hesitate to contact me.

Yours faithfully

Pete Boland  
Historic Places Adviser  
E-mail: [peter.boland@english-heritage.org.uk](mailto:peter.boland@english-heritage.org.uk)



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Historic England

Bredon NP  
c/o Bredon Parish Clerk  
Ms Jacqueline Shields  
Bredon Village Hall  
Bredon  
Tewkesbury  
GL20 7QN

Our ref:  
00018089

Your ref:

Telephone  
0121 256887

13 April 2016

Dear Sirs

### **BREDON PRE-SUBMISSION DRAFT NEIGHBOURHOOD PLAN – CONSULTATION**

Thank you for the invitation to comment on the Bredon pre- submission Draft Neighbourhood Plan and we are gratified to see that the amendments suggested by Historic England in our response to an earlier draft (letter dated 1<sup>st</sup> December 2015) have been incorporated in this iteration of the Plan. Your provision of a copy of the Plan showing tracked changes was very helpful, thank you.

On this basis there is little to add to our original conclusions as expressed in our earlier letter viz:

*“Historic England are supportive of the content of the document, particularly its’ emphasis on the heritage of the Parish and local distinctiveness. We also highly commend the approaches taken in the Plan to the conservation of the historic environment and consider it to be a well-considered, concise and fit for purpose document”.*

I hope you find these comments and advice helpful. If you have any queries please do not hesitate to contact me.

Yours faithfully

Pete Boland  
Historic Places Adviser  
E-mail: [peter.boland@english-heritage.org.uk](mailto:peter.boland@english-heritage.org.uk)



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PETER MARREN  
Dr. MARGARET PALMER, MBE  
BRETT WESTWOOD  
ROGER WORKMAN

Parish Clerk  
Bredon Parish Council  
Bredon Village Hall  
Main Road  
Bredon  
Tewkesbury  
GL20 7QN

16 March 2016

Dear Ms Shields

**RE: BREDON PARISH NEIGHBOURHOOD PLAN CONSULTATION**

The Trust welcomes the opportunity to comment on the Pre-Submission draft of the Bredon Parish Neighbourhood Plan.

Kemerton Conservation Trust is a membership-supported registered charity promoting the conservation of wildlife and important landscapes. It operates chiefly in the Bredon Hill area, where it owns or leases seven reserves. The Trust employs a Conservation Advisor, Nature Warden and Volunteer Coordinator. It is assisted by approximately seventy volunteers based in the local community.

The Trust is pleased to see detailed comments and policies in respect of landscape, the Cotswolds AONB, biodiversity and local heritage within the parish. In particular, the Trust welcomes Policies NP1 (Spatial Plan for the Parish), NP2 (Local Gaps & Key Views), NP9 (Local Listed Buildings & Structures), NP13 (Local Green Space) and NP14 (Landscape & Biodiversity).

The Trust is supportive of the Plan and considers it to be well-considered and fit for purpose. It believes it will help to deliver sustainable development which at the same time preserves the special local distinctiveness of Bredon Parish.

Yours sincerely

John Clarke  
Conservation Advisor  
Kemerton Conservation Trust



Parish Clerk  
Bredon and Bredon's Norton Parish Council  
Bredon Village Hall  
Main Road  
Bredon  
Tewkesbury  
GL20 7QN

Robert Deanwood  
Consultant Town Planner

Tel: 01926 439078  
[n.grid@amecfw.com](mailto:n.grid@amecfw.com)

Sent by email to:  
[bredonpc@btconnect.com](mailto:bredonpc@btconnect.com)

17 March 2016

Dear Sir / Madam

**Bredon and Bredon Norton Neighbourhood Plan Consultation  
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.

**About National Grid**

National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.

**Specific Comments**

An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus.

National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.

**Gas Distribution – Low / Medium Pressure**

Whilst there is no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network please contact [plantprotection@nationalgrid.com](mailto:plantprotection@nationalgrid.com)

**Key resources / contacts**

National Grid has provided information in relation to electricity and transmission assets via the following internet link:

<http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/>

The electricity distribution operator in Wychavon District Council is Western Power Distribution. Information regarding the transmission and distribution network can be found at: [www.energynetworks.org.uk](http://www.energynetworks.org.uk)

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Robert Deanwood  
Consultant Town Planner

[n.grid@amecfw.com](mailto:n.grid@amecfw.com)

Amec Foster Wheeler E&I UK  
Gables House  
Kenilworth Road  
Leamington Spa  
Warwickshire  
CV32 6JX

Ann Holdsworth  
Development Liaison Officer, National Grid

[ann.holdsworth@nationalgrid.com](mailto:ann.holdsworth@nationalgrid.com)

National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

I hope the above information is useful. If you require any further information please do not hesitate to contact me.

Yours faithfully

[via email]

**Robert Deanwood**  
**Consultant Town Planner**

cc. Ann Holdsworth, National Grid

Date: 10 December 2015  
Our ref: 171807  
Your ref: Bredon Neighbourhood Plan



Bredon Parish Council  
**BY EMAIL ONLY**

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Sir/madam

**Planning consultation:** Bredon Parish Neighbourhood Plan 2015 - 2030

**Location:** Bredon, Worcestershire

Thank you for your consultation on the above dated 17 December 2015 which was received by Natural England on 18 December 2015.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England are unable to fully assess the impacts of this plan as we feel that it does not include enough information in regards to the protected sites within the Neighbourhood Plan area.

Bredon Hill Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) is mentioned briefly as having been screened out for any impacts, however we would like to see evidence of this screening and some detail as to why any significant impacts have been screened out.

Rectory Farm Meadows SSSI is also within the Neighbourhood Plan area but again it is only mentioned once. We would like to see evidence that the SSSI has been acknowledged when planning new development in the Neighbourhood Plan area.

Once this information has been provided within the plan we will then respond in more detail to the rest of the plan and its policies.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Liz Appleyard on 03000602852. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Liz Appleyard  
Lead Adviser – Planning. South Mercia Sustainable Development team

Date: 17 April 2016  
Our ref: 180649  
Your ref: Neighbourhood Plan



Ms J. Shields  
Bredon & Bredon's Norton Parish Council  
Bredon Village Hall  
Main Road  
Bredon  
Tewesbury  
GL20 7QN

Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

**BY EMAIL ONLY**

Dear Ms Shields

**Re: Pre-Submission Draft- Bredon Parish Neighbourhood Plan consultation**

Thank you for your consultation on the above dated 07/03/2016

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**Bredon Parish Neighbourhood Plan.**

**General**

We welcome the criteria within various policies for green infrastructure (SUDs, green corridors for example) and sustainable construction which promote sustainable development.

**NP14: Landscape & Biodiversity**

We welcome this policy.

**Further Guidance**

We refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For clarification of any points in this letter, please contact Gillian Driver on 0208 026 0995. For any further consultations on your plan, please contact: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

[Redacted signature]

Miss Gillian Driver  
Planning Adviser  
South Mercia Team



## Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

### Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)<sup>1</sup> website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification**, **Ancient Woodland**, **Areas of Outstanding Natural Beauty**, **Local Nature Reserves**, **National Parks (England)**, **National Trails**, **Priority Habitat Inventory**, **public rights of way (on the Ordnance Survey base map)** and **Sites of Special Scientific Interest (including their impact risk zones)**.

Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)<sup>2</sup>.

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>3</sup>. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

**National Character Areas** (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)<sup>4</sup>.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)<sup>5</sup> website and also from the [LandIS website](http://www.landis.org.uk/)<sup>6</sup>, which contains more information about obtaining soil data.

### Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework--2)<sup>7</sup> sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)<sup>8</sup> sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

### Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

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<sup>1</sup> <http://magic.defra.gov.uk/>

<sup>2</sup> <http://www.nbn-nfbr.org.uk/nfbr.php>

<sup>3</sup> <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>4</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

<sup>5</sup> <http://magic.defra.gov.uk/>

<sup>6</sup> <http://www.landis.org.uk/index.cfm>

<sup>7</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>8</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

### Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)<sup>9</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>10</sup>. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

### Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)<sup>11</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>12</sup> to help understand the impact of particular developments on protected species.

### Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)<sup>13</sup>.

## **Improving your natural environment**

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape. Woodland planting can also help mitigate flooding, see [Woodland for Water: Woodland measures for meeting Water Framework Directive objectives](#) for further information.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife. Reducing light pollution will not only improve views of the night sky but also reduce the impacts on species, like bats (which are protected under The Conservation of Habitats and Species Regulations 2010 (as amended) (Habitats Regulations)) which can be adversely affected by inappropriate lighting. The Bat Conservation Trust has produced [Interim Guidance: Artificial lighting and wildlife - Recommendations to help minimise the impact of artificial lighting](#) and [Bats and Lighting in the UK](#) which you may wish to refer to.
- Adding a green roof to new buildings. Research indicates that green roofs/living roofs can reduce run-off and thereby the risk of surface water flooding; reducing the requirement for

<sup>9</sup><http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>10</sup><https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

<sup>11</sup><http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>12</sup><https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

<sup>13</sup><http://publications.naturalengland.org.uk/publication/35012>

heating and air-conditioning; and providing habitat for wildlife. Further information can be found here: <http://livingroofs.org/>.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community. You may find it helpful to refer to the [DCLG Planning practise guidance on green infrastructure](#)
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#) <sup>14</sup>).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

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<sup>14</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

**From:** Morgan Barbara [<mailto:Barbara.Morgan@networkrail.co.uk>]  
**Sent:** 13 April 2016 09:47  
**To:** [bredonpc@btconnect.com](mailto:bredonpc@btconnect.com)  
**Subject:** Bredon Parish Neighbourhood Plan

Dear Sir/Madam

Network Rail has been consulted by Bredon & Bredon's Norton Parish Council on the Pre-Submission Draft Neighbourhood Plan. Thank you for providing us with this opportunity to comment on this Planning Policy document. This email forms the basis of our response to this consultation request.

Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure. In this regard, please find our comments below:

Network Rail would draw the parish council's attention to the following (which applies to England only):

**The Town and Country Planning (Development Management Procedure) (England) Order 2015  
Publicity for applications for planning permission within 10 metres of relevant railway land**

**16.—**(1) This article applies where the development to which the application relates is situated within 10 metres of relevant railway land.

(2) The local planning authority must, except where paragraph (3) applies, publicise an application for planning permission by serving requisite notice on any infrastructure manager of relevant railway land.

(3) Where an infrastructure manager has instructed the local planning authority in writing that they do not require notification in relation to a particular description of development, type of building operation or in relation to specified sites or geographical areas ("the instruction"), the local planning authority is not required to notify that infrastructure manager.

(4) The infrastructure manager may withdraw the instruction at any time by notifying the local planning authority in writing.

(5) In paragraph (2) "requisite notice" means a notice in the appropriate form as set out in Schedule 3 or in a form substantially to the same effect.

Developer Contributions

The Bredon Parish Neighbourhood Plan should set a strategic context requiring developer contributions towards rail infrastructure where growth areas or significant housing allocations are identified close to existing rail infrastructure.

Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car parking, improved access arrangements or platform extensions.

As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.

Specifically, we request that a Policy is included within the document which requires developers to fund any qualitative improvements required in relation to existing facilities and infrastructure as a direct result of increased patronage resulting from new development.

The likely impact and level of improvements required will be specific to each station and each development meaning standard charges and formulae may not be appropriate. Therefore in order to fully assess the potential impacts, and the level of developer contribution required, it is essential that where a Transport Assessment is submitted in support of a planning application that this quantifies in detail the likely impact on the rail network.

To ensure that developer contributions can deliver appropriate improvements to the rail network we would recommend that Developer Contributions should include provisions for rail and should include the following:

- A requirement for development contributions to deliver improvements to the rail network where appropriate.
- A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated.
- A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. In order to be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail's remit.

### Level Crossings

Councils are urged to take the view that level crossings can be impacted in a variety of ways by planning proposals:

- By a proposal being directly next to a level crossing
- By the cumulative effect of development added over time
- By the type of crossing involved
- By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing
- By developments that might impede pedestrians ability to hear approaching trains
- By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs
- By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing.

Wychavon Council have a statutory responsibility under planning legislation (***Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) order, 2010***) to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over the railway. Therefore, as Bredon & Bredon's Norton Parish Council will be the authority in this case they will still need to consult with Network Rail under schedule 5 on their proposals to determine if they impact upon the above mentioned level crossings.

Whilst Network Rail has no objection in principle to the Neighbourhood Development Plan by Bredon & Bredon's Norton Parish Council, we would request the opportunity to comment on any future planning applications should they be submitted for sites adjoining the railway, or within close proximity to the railway as we may have more specific comments to make (further to those above).

We trust these comments will be considered in your preparation of the forthcoming Neighbourhood Development Plan document.

Regards,

**Barbara Morgan**

Town Planning Technician (Western and Wales)  
1st Floor, Temple Point  
Redcliffe Way, Bristol BS1 6NL

Tel: 0117 372 0125 – Int: 085 80125

Fax: 0117 372 1146 – Int: 085 80146

Email: [townplanningwestern@networkrail.co.uk](mailto:townplanningwestern@networkrail.co.uk)

[www.networkrail.co.uk/property](http://www.networkrail.co.uk/property)



Ms Jacqueline Shields  
Bredon Village Hall  
Main Road  
Bredon  
Tewkesbury  
GL20 7QN

Your ref:  
Our ref:  
Email: Sarah.faulkner@nfu.org.uk  
Direct line: 01952 409247  
Date: 27/11/2015

Dear Ms Shields,

### **Bredon Neighbourhood Parish Plan – Pre-Submission Plan, October 2015**

Thank you for giving us the opportunity to comment on the Bredon Neighbourhood Parish Plan Consultation. The NFU is a professional body which represents the interests of 75% of all farmers and growers. We have over 650 farming businesses in membership in Worcestershire and our views are on behalf of the farming and land management sector in general.

Bredon Parish is set in an agricultural landscape and farming makes an important contribution to the setting of the parish. Farm businesses have an essential role in maintaining the local landscape by grazing livestock, maintaining hedgerows and participating in agri-environment schemes. Therefore we believe that the plan ought to be strengthened in order to recognise the importance of farming and of supporting the economic role of the countryside.

We would like you to look again at Policy 2: Local Gaps & Key Views. We are concerned about this approach to Key Views as it may place additional restrictions upon land use, rather than allowing development proposals to be judged on their own merits. Therefore there ought to be some support within the policy for building developments that support agricultural businesses and for essential rural workers dwellings. Agricultural businesses have to adapt to current standards for animal welfare and environmental management whilst responding to market demands for increased food production. This often leads to a need for new infrastructure and buildings. The ability to change and develop is fundamentally necessary to the future of the rural economy and the management of agricultural land.

Provision of new housing for those employed in agriculture and rural businesses is key to the development of a vibrant and economically sustainable rural economy. The current shortfall of rural housing and the large gap between rural earnings and average house prices makes it increasingly difficult for rural people to stay in their local area and contribute to the community and economy.

I hope that you find our contribution to the consultation useful. The NFU is keen to assist the council with the development of planning policy so if you require further information or clarification of any of the points raised in this response please do not hesitate to contact me at the West Midlands Regional Office.

---

Yours sincerely

**Sarah Faulkner**  
**Environment and Rural Affairs Adviser**  
**NFU West Midlands**





# Rooftop

Housing Group

70 High Street  
Evesham  
Worcestershire  
WR11 4YD

Tel: 01386 420800  
Fax: 01386 420820  
enquiries@rooftopgroup.org  
www.rooftopgroup.org

3 December 2015

Chairman: Cllr P Hardy  
Clerk: Ms J Shields  
Bredon Village Hall  
Main Road  
Bredon  
Tewkesbury  
GL20 7QN

Dear Cllr Hardy and Ms Shields

## Draft Neighbourhood Plan Consultation

Thank you for your letter inviting Rooftop to comment on your draft Neighbourhood Plan. Rooftop is a leading provider of affordable housing within Wychavon and we continue to deliver exceptional new-build developments within the area for the benefit of local people in housing need.

In Bredon alone we have an interest in over 100 properties which consist of rented accommodation, shared ownership and freehold properties. Of these 100 homes, 65 are rented properties and 22 have the preserved right to buy. Recent announcements from central Government suggest that the right to buy may be extended to all rented properties, which further threatens the existence of affordable rented accommodation unless future delivery of new housing can be act as a replacement.

We enclose a leaflet, 'Valuing the Village', which explains in more detail the important role housing associations can play in maintaining the life and vitality of many of this nation's historic villages.

It is encouraging that the results of your residents' survey demonstrates a strong desire to ensure that new development should include a 40% provision of affordable housing for local people. We would welcome the opportunity, working in collaboration with the Parish Council, to extend this research and produce a complete Housing Needs Survey to fully assess the demand for future development.

Such an approach would comply with SWDP policy 59 which promotes affordable housing delivery in Category 1 villages where there is a present and/or future need. We would request that the draft plan is reviewed to include the possibility for such 'exception' development, subject to the assessment of need being proven.

Until such a time that a thorough survey is completed, it is unclear whether the delivery of the Oak Lane allocation would sufficiently meet local need in terms of affordable housing. Furthermore, the Government's suggestion that Starter Homes could replace affordable rent as a tenure, further jeopardises this position.





The parish is obviously keen to protect the natural environment, as are we, and we note the proposals to allocate both local gaps and local green space designations. We are currently in the process of producing our Environmental Strategy which, amongst other matters, will consider how we introduce open space into new developments. A great example of how we have achieved this to date can be seen at our zero carbon development at Blakes Hill, North Littleton.

We would welcome the opportunity for ongoing involvement. If you have any queries with regards to this letter please contact me using the details provided below.

Yours sincerely,



Craig MacDonald MRICS MRTPI  
**Business Development Manager**  
For and on behalf of Rooftop Housing Association  
01386 420800 ext 175  
[Craig.macdonald@rooftopgroup.org](mailto:Craig.macdonald@rooftopgroup.org)



**To:** The Clerk, Bredon Neighbourhood Plan

**Date:** 02/12/2015

**From:** Natasha Friend, Principal Planner

**Subject:** Consultation from, Bredon Parish

**Recommendation:** that these comments are taken into account during the production of the Bredon Neighbourhood Plan.

**Summary of Worcestershire County Council response:** In respect of the departments contributing to this advice, Worcestershire County Council officers have no objection to this emerging plan. The comments of contributing departments referred to below are intended to help improve the sustainability of the proposal and to direct the Parish Council towards best practice. Any departments not included within this response may choose to comment and/or object separately.

**Location:** Bredon

**Proposal:** Consultation on the Bredon emerging Neighbourhood Plan.

## Introduction

Thank you for consulting Worcestershire County Council on the Bredon Emerging Neighbourhood Plan. We do not object to the emerging plan and to assist the Parish Council in future stages of the process we would like to bring to their attention the following comments, strategic documents and designations. This response comprises officer only comments.

Please ensure that when you are writing your policies that as well as referencing local circumstances you also back them up local evidence to justify the policy in your area.

## Minerals and Waste Planning Policy

We are pleased to note that the history of sand and gravel working and benefits of mineral site restoration in the parish are noted in Chapter 2.

However we are concerned that Chapter 3 only refers to the Wychavon District Local Plan and emerging South Worcestershire Development Plan. In addition to these, as highlighted in our response to the consultation on the designation of the neighbourhood area, the Waste Core Strategy (2012) and the adopted County of Hereford and Worcester Minerals Local Plan (1997) form part of the Development Plan for the area, and a new Minerals Local Plan for

**Natasha  
Friend**  
Principal Planner  
Business,  
Environment and  
Community  
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WR5 2NP

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NFriend@worcestershire.gov.uk • www.worcestershire.gov.uk

Worcestershire is under preparation. Whilst it is true that as County Matters, minerals and waste developments are "excluded development" under Section 61 of the Localism Act, meaning that the neighbourhood plan and any development orders are not be able to make provision for minerals or waste development in that area, it is important that the Neighbourhood Plan is in conformity with the development plan as a whole, and does not conflict with the provisions of the Waste Core Strategy or Minerals Local Plan.

The Planning Policy Context in Chapter 3 should therefore refer to relevant strategic minerals and waste policies, including the minerals safeguarding aspects in the National Planning Policy Framework and certain policies of the Waste Core Strategy and the Minerals Local Plan as outlined below.

Paragraph 142 of the National Planning Policy Framework (NPPF) recognises that "Minerals are essential to support sustainable economic growth and our quality of life. It is therefore important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation."

Paragraph 143 of NPPF therefore refers to the need for Local Plans to "define Minerals Safeguarding Areas and adopt appropriate policies in order that known locations of specific minerals resources of local and national importance are not needlessly sterilised by non-mineral development, whilst not creating a presumption that resources defined will be worked; and define Minerals Consultation Areas based on these Minerals Safeguarding Areas" as well as to safeguard infrastructure associated with transporting, storing, handling or processing minerals, minerals products and recycled and secondary aggregate materials.

Please note that paragraph 144 of NPPF states that when determining planning applications, local planning authorities should "not normally permit other development proposals in mineral safeguarding areas where they might constrain potential future use for these purposes".

The Planning Practice Guidance outlines this further, stating that "since minerals are a non-renewable resource, minerals safeguarding is the process of ensuring that non-minerals development does not needlessly prevent the future extraction of mineral resources, of local and national importance", and that we should use the best available information on the location of mineral resources in the area.

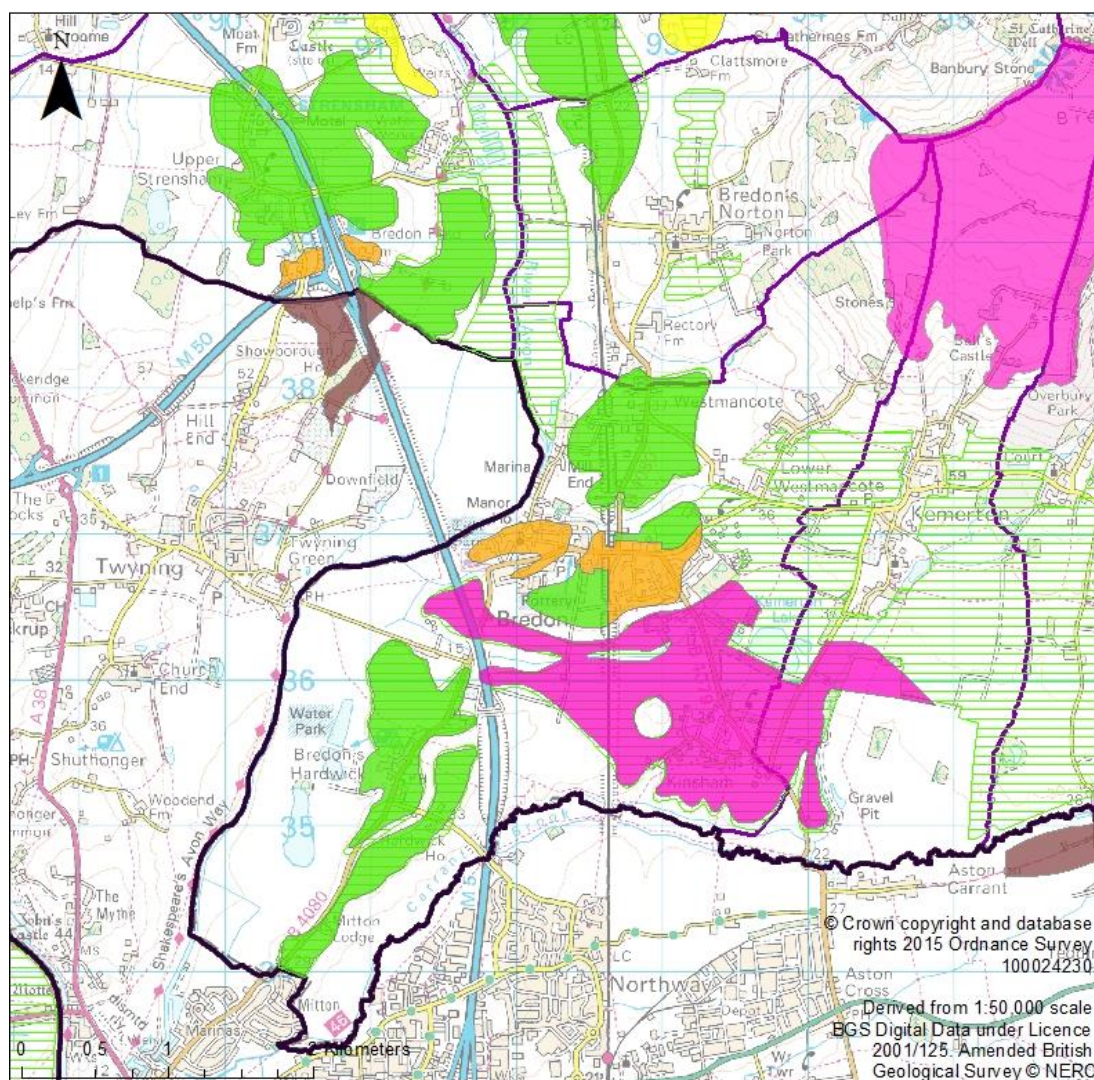
## **Minerals Local Plan**

The adopted County of Hereford and Worcester Minerals Local Plan contains Minerals Consultation Areas within the Bredon Neighbourhood Area. In addition, a new Minerals Local Plan for Worcestershire is being developed, and background work has been undertaken to assess the potential significance of resources in the county which will form the basis for identifying Minerals Safeguarding Areas and Minerals Consultation Areas in the emerging Minerals Local Plan. There are a number of significant sand and gravel resource areas within the Bredon Neighbourhood Plan area.

Safeguarding a mineral resource does not create a presumption that resources defined will be worked, and is not an absolute bar on other forms of development, but consideration will need to be given to ensure minerals are not needlessly sterilised. This has been considered for the site allocations proposed in the South Worcestershire Development Plan (SWDP).

We do not think the policies proposed in the Bredon Neighbourhood Plan need to be amended, as the minerals safeguarding policies are contained elsewhere in the Development Plan, but it would be useful for them to be recognised in the Planning Policy Context in Chapter 3 as they have potential implications for other forms of development.

We have provided the image below for your information, and we would be happy for you to include this in your plan. Alternatively we would be happy to work with you to provide maps in an appropriate format for inclusion in the Neighbourhood Plan. Please contact Marianne Joynes on 01905 766374 or at [minerals@worcestershire.gov.uk](mailto:minerals@worcestershire.gov.uk).



## Legend

- Key resource
- Significant resource
- Not significant resource
- Compromised resource
- Out of county
- sand & gravel consultation area

## Waste Core Strategy

Settlements within Worcestershire perform different waste management functions. The geographic hierarchy takes into account current waste arisings, resource demand and existing waste management capacity of each settlement. The settlements which have a major role to play are in the top levels (level 1 is the highest level) and those which have only a minor role are in the bottom levels (level 5 is the lowest level).

Bredon Parish is in Level 5 which is the lowest level of the geographic hierarchy, meaning any proposals for waste management development would need to be strongly justified.

There are no specific site allocations for waste management facilities in the Waste Core Strategy as a whole or in Bredon Parish in particular. However, the Parish Council should be aware that proposals for waste management facilities could be acceptable within the Neighbourhood Plan area.

### Policy WCS 5: Landfill and disposal

The Waste Core Strategy seeks to ensure that waste is managed as a resource in accordance with the waste hierarchy. Landfill and disposal of waste should be a last resort. This is relevant to the development of neighbourhood plans in relation to excavated materials from development.

The explanatory text supporting policy WCS 5 states that "excavation activities, a normal part of the construction process, can result in considerable arisings of subsoils. In some cases, this type of waste can usefully be re-used for purposes such as... landscaping, levelling of sites, the construction of bunds, embankments or features for noise attenuation. However, **to prevent inappropriate development, these kinds of proposals will be considered against Policy WCS 5: Landfill and disposal.** The decision on whether proposals are a form of disposal will be guided by the Environment Agency's advice (currently set out in "Defining Waste Recovery: Permanent Deposit of Waste on Land" Regulatory Guidance Series No RGN13)". (<https://www.gov.uk/government/publications/rgn-13-defining-waste-recovery-permanent-deposit-of-waste-on-land>).

We consider that this is potentially addressed by point 1 in policy 6 "Design of Exterior Works & Private Gardens" but it could be made more explicit by requiring landscaping schemes which take account of the setting of the



development and for proposals to address the appropriate disposal of any excavated materials.

#### WCS 16: New development proposed on or near to existing waste management facilities

Policy WCS 16 aims to safeguard existing waste management facilities by considering the potential impact and design of new development on or near to existing waste management facilities.

A web-tool has been developed to support this policy (available through the Waste Core Strategy webpage [www.worcestershire.gov.uk/wcs](http://www.worcestershire.gov.uk/wcs)) which will help the Parish Council and any developers to establish whether there any waste management facilities within 250m and if so, the provisions of this policy should be applied.

At present, there are no waste management facilities within Bredon Parish.

#### WCS 17: Making provision for waste in all new development

We would like to see recognition in the Plan of the need for integration of bin stores and recycling facilities, as this would help developers to conform to the requirements of Waste Core Strategy Policy WCS 17. We would suggest that an additional point is included in both Policy 3 "Design of New Buildings" and Policy 5 "Design of Alterations & Conversions" along the lines of "incorporate facilities into the design to allow occupiers to separate and store waste for recycling and recovery."

This should help to address the Plan's other concerns around visual amenity and impact on the street scene by minimising the amount of visible domestic paraphernalia.

### **Green Infrastructure**

#### **Worcestershire Green Infrastructure Partnership**

The Strategic Planning and Environmental Policy Team at Worcestershire County Council is a lead member of the Worcestershire Green Infrastructure (GI Partnership) and provides its secretariat. The GI Partnership includes the statutory agencies such as the Environment Agency, Natural England, Forestry Commission and English Heritage, local authorities, and voluntary sector organisations such as Worcestershire Wildlife Trust.

### ***What is green infrastructure?***

Green Infrastructure or GI is the network of green spaces that intersperse and connect our cities, towns and villages, providing multiple benefits for environment, economy and communities. GI is a holistic approach to viewing and managing the natural environment; acknowledging the multiple benefits and vital services it provides and making tangible links to economic, health and social welfare agendas and aspirations. The components of GI include biodiversity, landscape, historic environment, access and recreation and water.

The underlying principle of GI is that the same area of land can frequently offer multiple benefits. Multifunctionality may be defined as the ability to perform several functions and provide several benefits in the same spatial area. The functions delivered can be environmental, such as conserving biodiversity or adapting to climate change; social, such as providing greenspace; or economic, such as supplying jobs or increasing property prices.

GI can be delivered at a number of different levels depending on the nature of the project proposed:

- **Strategic or county scale:** These are large-scale projects which provide functions and facilities which benefit more than one district or population within the county. An example of strategic green infrastructure would be the provision of a 100ha+ country park to attract visitors from the whole of the county, or a large-scale flood scheme to reduce incidence of fluvial flooding.
- **District scale:** These are green infrastructure schemes providing a range of functions at a district level which benefit the population of the district. An example is the green infrastructure corridor alongside the River Severn in Worcester, providing a range of functions including flood alleviation, off-road walking and cycling routes and enhanced biodiversity.
- **Neighbourhood or local scale:** These are small-scale green infrastructure enhancements which would typically be included within a development site. Examples could include off-road walking and cycling routes connecting with the local centre which also includes sustainable drainage provision through swales and balancing ponds.

### ***National Policy***

National planning policy provides strong support to planning for green infrastructure:

- **Natural Environment White Paper (2011)** recognises green infrastructure as an important ecological link between town and country. The document emphasises multifunctional benefits of



GI such as supporting economic growth, improving health and wellbeing and reducing the negative impacts of climate change.

- **National Planning Policy Framework (2012)** states that Local Plans should address climate change, biodiversity and landscape issues through *"planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure"*.
- **National Planning Policy Guidance (2013)** states that *"local and neighbourhood plans and planning decisions have the potential to affect biodiversity or geodiversity outside as well as inside designated areas of importance for biodiversity or geodiversity. Local planning authorities and neighbourhood planning bodies should therefore seek opportunities to work collaboratively with other partners, including Local Nature Partnerships, to develop and deliver a strategic approach to protecting and improving the natural environment based on local priorities and evidence"*.

#### ***Worcestershire Green Infrastructure Strategy: county level***

A focus for the GI Partnership has been development of the Worcestershire Green Infrastructure Strategy (GI Strategy) and supporting evidence to guide the delivery of green infrastructure in the county through development, regeneration and environmental projects. The Strategy is now complete and is available, together with all associated documents, on the Worcestershire County Council web pages ([www.worcestershire.gov.uk/GI](http://www.worcestershire.gov.uk/GI)).

The GI Strategy has been informed by the evidence base documents which include:

- **GI Framework 1 (November 2008)** provided an introduction to the concept of Green Infrastructure (GI) and also identified the need for the strategic planning of GI and the policy drivers that support the planning of GI at differing spatial scales.
- **GI Framework 2 (July 2012)** provided an introduction to the natural environment data sets of landscape, biodiversity and historic environment and developed the concept of GI Environmental Character Areas based on the quality and quantity of these natural environment assets.
- **GI Framework 3 (May 2013)** identified the functionality, and supply of strategic recreational assets in Worcestershire. It also explores the

potential need for new recreational assets and identified areas of search and potential funding mechanism for new facilities.

- **GI Framework 4 (September 2014)** explores how the multifunctional green infrastructure solutions can provide economic and health benefits as well as contribute to climate change mitigation and adaptation.

The GI Partnership is currently developing another paper on viability and costing of green infrastructure to support delivery of green infrastructure by different stakeholders.

#### ***District and neighbourhood scales***

The GI Strategy is a strategic document and only the first step in planning and delivering of GI in the County. It is envisaged that district councils will develop further work based on the vision and priorities established in the Strategy. The more localised assessment of the strategic priority areas should be undertaken by each authority. This approach is being supported within the adopted and emerging district Local Plans.

Similarly, it is encouraged that any emerging Neighbourhood Plans will have regard to the GI priorities identified in the GI Strategy. Furthermore, the evidence base developed to support the Strategy could be used to inform Neighbourhood Plans.

#### ***Site level***

Worcestershire GI Partnership also works at the site level to prepare GI Concept Plans and Statements which contain principles and priorities for GI on the strategic sites in Worcestershire. The GI Partnership is currently testing an innovative model of joint working with the potential applicants to inform their masterplanning in order to ensure that there is a sufficient amount of good quality, accessible green infrastructure provided to protect and enhance natural environment as well as to support the local economy as well as health and well-being of the future residents.

#### **Detailed NHP comment**

Under paragraph 3.7 the NHP could also usefully refer to SWDP 5: Green infrastructure as the plan talks about Local Green Networks policies and some of the GI principles such as providing native tree species or preserving hedgerows.

Policy 14: Landscape & Biodiversity - *Proposals that will have a detrimental impact on long-established hedgerows which are visually prominent (especially along the main approach roads within the parish) or which are important for biodiversity, will be refused.* – We would suggest that these hedgerows should be established for their biodiversity value as well – not only from a visual perspective.

#### **Policy 6: Design of Exterior Works & Private Gardens –**

Does the plan detail the evidence for the need to expand upon already in place permitted development rights?

***conserve and enhance the integrity of gardens and open spaces;*** - this could be further expanded upon to include reference to creating green corridors using their front gardens (trees, hedges, grass verges) – for the visual, biodiversity and flood risk value.

#### **Highways**

Worcestershire County Council Highways, is generally supportive of the proposed Policy 7: Design of Roads & Footways within the Bredon Parish Neighbourhood Plan, however, wishes to raise the following points in relation to some of the provisions:

Point 3. with regard to new and replacement pavements and footways – do not harm the character of proximate heritage assets and have an appearance in keeping with their surroundings, with natural stone kerbs rather than concrete being used in Conservation Areas and other sensitive locations;

Worcestershire County Council Highways Authority requests that the above policy is amended, to ensure that any paving materials used are also complimentary to Conservation Areas and other sensitive locations:

Point 2. minimise the use of road markings, permanent signage and lighting, and are in keeping with their surroundings where possible;

Point 4. avoid the use of kerb stones on rural grass verges to preserve rural character;

Point 5. avoid the use of street lighting;

Whilst Worcestershire County Council (as the Local Highway Authority) is supportive of provisions 2, 4 and 5, it should be recognised that in some (rare)

cases, the Authority will be required to consider the implementation of certain measures to improve road safety and or highway drainage as part of the discharge of its statutory duties. For example, kerbing on rural roads is sometimes required to prevent collapse of the carriageway (in the case of soft verges), improve drainage and prevent vehicular damage to properties and verges. Also, street lighting, signing and lining measures are sometimes necessary to enhance road safety. Worcestershire County Council requests that cases such as these are considered on a case-by-case basis and a caveat is included within this policy to make provision for such cases.

### **Flood Risk Management**

In 2010 the Flood and Water Management Act (FWMA) delegated upper-tier authorities as Lead Local Flood Authorities (LLFA) with responsibility for their respective area's Local Flood Risk Management.

Worcestershire County Council is therefore the LLFA for Worcestershire. This role currently relates to ordinary watercourses (usually smaller brooks and streams but not all), surface water (overland flow) and groundwater flooding - fluvial flooding from main rivers is still currently the responsibility of the Environment Agency.

We note that the Plan contains a policy regarding design of new buildings (policy 3). This policy states that:

#### **Policy 3: Design of New Buildings**

***Proposals for new buildings will be supported, provided they:***

- ***reduce flood risk by ensuring the free running of all watercourses, gullies and culverts; by using soak-aways for roof run-off; and by avoiding the use of impermeable surfaces such as tarmac in gardens and driveways;***
- ***reduce flood risk by ensuring the free running of all watercourses, gullies and culverts***
- ***avoiding the use of impermeable surfaces such as tarmac in gardens and driveways –***

We would suggest that Policy 3 might usefully be followed with a few words about the use of permeable paving and that correct conditions which will be needed to use this and that maintenance of permeable paving is required for it to remain "permeable"

*Regarding the use of 'soak-aways for roof run-off' - It could be said this is above national requirements and at times could be unachievable and may not be appropriate in some circumstances. We suggest that this statement is replaced with a statement asking for SuDS to be used on all developments of 1 house or more. This would be a significant gain.*

### **Sustainability**

We draw to your attention the following data; the east side of the parish have some of the highest levels of fuel poverty in the county (20 – 30% households unable to afford to heat their homes adequately (2012 DECC data). For development in areas of the parish that are off gas grid in particular, renewable energy and/or ultra-energy efficient building design should make good financial sense as well as reducing carbon emissions.

We would suggest amending the neighbourhood plan to include reference to building energy efficiency, low carbon energy sources, (such as renewable energy e.g. ground, air or water source heat, PV etc.), and opportunities for community energy generation etc., perhaps within Policy 3: design of new buildings.

Community energy generation can be a range of options from a community renewables scheme e.g. PV on a community building to a district heat network; a shared heating system for a new development.

A statement related to the community's stance on larger scale renewable energy generation might also be relevant.

For guidance related to low carbon neighbourhood planning  
<https://www.cse.org.uk/downloads/reports-and-publications/policy/community-energy/energy-advice/planning/renewables/low-carbon-neighbourhood-planning-guidebook.pdf>

### **Education**

In response to the Bredon Parish Neighbourhood Plan, Children's Services (of Worcestershire Local Authority) have no specific comments in respect of the plan but acknowledges the reference to the school and school playing field provision and wishes to provide the following response to the proposals:

1. The Local Authority acknowledges the comments set out in the objectives 'to maintain and enhance community facilities such as the school', as identified in item 5.2.
2. The Local Authority acknowledges the comments with regard to Assets of Community Value, in particular, Bredon Hancocks Endowed CE First School playing Field as set out in Policy 10.

### **Concluding Remarks**

We hope that these comments prove useful in the future development of the Bredon Neighbourhood Plan and would offer the opportunity to discuss with the Parish Council any of these issues highlighted above. It is worth noting, once again, this response is officer only comments.

Yours sincerely

**Natasha Friend**  
Principal Planner

**From:** Adrian Darby [REDACTED]  
**Sent:** 11 December 2015 15:34  
**To:** [bredonpc@btconnect.com](mailto:bredonpc@btconnect.com)  
**Subject:** Bredon Neighbourhood Plan

I see from your website that any response to the consultation on the Bredon Neighbourhood Plan should have been submitted by 5 pm last Friday. I hope that the Parish Council will be able to accept a comment from me after that date.

My comment specifically relates to Policy 13 Local Green Spaces as shown on Map B. I note that the two sites which were the subject of recent appeals, **Land at Cheltenham Road APP/H1840/A/14/2217607 for 33 dwellings** and **Land off Tewkesbury Road APP/H1840/A/14/2222679 for 98 dwellings**, have not been included in this map although each site is part of a larger gap (Gap 3 and Gap 4) in Map A. Having sat through both of the two public inquiries into these appeals and having read the inspectors' reports I consider that each of these two sites were regarded by the inspector as deserving special consideration and thus qualifying for Local Green Space designation. I can expand on this argument with detailed reference to the two decision letters if it is necessary and if you would consider it useful. However as I am aware that I have already missed the formal consultation deadline I do not wish to spend a lot of time developing the case if it is too late to have any effect.

If you would like me to expand on my argument and explain my role as Wychavon's Heritage Champion which resulted in my appearance at both the above inquiries I would be happy to do so. Needless to say my evidence in each case was that each site was extremely important for Bredon's Heritage in terms of Landscape, Biodiversity and Historic Buildings.

Yours faithfully

Adrian Darby  
Wychavon District Councillor and Heritage Champion.

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**ADRIAN DARBY, OBE**



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3 December 2015

## Bredon Pre-Submission Neighbourhood Plan – Wychavon DC Response

Dear Jacqueline Shields, Clerk to Bredon Parish Council,

Many thanks for allowing Wychavon District Council the opportunity to comment on the Bredon Pre-Submission Neighborhood Plan. It was distributed to the relevant departments of the Council, with the responses received detailed below.

### Reiss Sadler/Andrew Ford – Planning Policy

Firstly, it was unfortunate for officers to have had very little contact with the NP group between Neighbourhood Area designation and draft NP consultation, with no view of the draft Plan or policies prior to the commencement of the consultation period. Many of the below points could have been easily addressed had there been some contact with Wychavon before the draft plan consultation commenced.

Para 1.1 – might be worth specifying that the Neighbourhood Area was designated by Wychavon's Executive Board on 17 March 2015.

Para 1.11 – this Paragraph states that Wychavon have produced a Strategic Environmental Assessment (SEA) screening opinion which concluded that a full SEA would not be required. The screening opinion process is usually undertaken by planning policy, which includes working through the draft document against set criteria to determine whether or not it has the potential to have significant negative environmental impacts. The SEA screening opinion is then sent on to the three statutory consultees (Historic England, Natural England and Environment Agency), with a view taken on whether or not a full SEA is required based on the report's conclusion and the nature of the response received. As we have not seen the draft Plan or any of the draft policies prior the consultation, this process could not have been undertaken?

Para 1.13 – it is assumed that this should state that the consultation runs until 5pm Friday 4<sup>th</sup> December to meet the required six-week consultation period.

Para 2.2 – 'r' in region should be lower case, as the 'West Midlands Region' and 'South West Region' technically no longer exist.

Para 2.8 – 'c' in century/centuries should be lower case.

Para 2.9 – 'EUs' has no apostrophe.

**Reiss Sadler** BSc (Hons)  
**Planning Officer**  
**Direct Dial** 01386 565430  
Reiss.Sadler@Wychavon.gov.uk





Para 2.12 – Bredon Barn is a ‘Scheduled Monument’, remove ‘Ancient’.

Para 3.1 – ‘c’ in county should be lower case.

Para 3.3 – this paragraph states that the SWDP will be adopted ‘some time after 2016’ – the anticipated adoption of the SWDP is currently early Spring 2016.

Para 3.4 – this paragraph lists the ‘saved’ policies of the WDLF that are relevant to the NP, however RES1 and ECON8 were not saved. Also worth making the point that the submitted NP is likely to be made post SWDP adoption.

Para 3.7 – following the examination of the SWDP and subsequent changes (Main Modifications which have been subject to consultation in the autumn of 2015), a number of policy titles have changed which includes some mentioned in this paragraph. These are SWDP3 Employment, Housing and Retail Provision Requirement and Delivery, SWDP10 Protection and Promotion of Centres and Local Shops, SWDP12 Employment in Rural Areas, SWDP13 Effective Use of Land, SWDP37 Built Community Facilities and SWDP38 Green Space. There are also several incorrect references throughout the document which should be updated accordingly.

Policy 1 – there seems to be inconsistent wording between paragraphs in this policy, with Para 1 suggesting that future development will only be directed to within the boundaries of the Bredon development boundary, but Para 2 adds that development outside of all development boundaries will not be supported? This should be re-written to make it clearer – suggesting development within the identified development boundaries of other villages of the NP area will not be supported is contrary to emerging strategic policy SWDP2.

Para 5.8 – worth mentioning that development boundaries are being carried forward from GD1 to SWDP2, extended to include all adjacent allocations.

Policy 2 – the principle of ‘Local Gaps’ is accepted, with the SWDP Inspector supporting the Significant Gap policy in SWDP2, however some are rather large and more-than serve their purpose, such as GAP5. Reference is made at Para 5.18 to the evidence base study ‘Analysis of Strategic Gaps between settlements in Bredon, 2015’, however this isn’t readily available either appended to the NP or on the webpage.

Para 5.11 – amend wording to read “... WDLF policy SR10 Strategic Gaps, as well as emerging strategic policy SWDP2 A Significant Gaps...”

Para 5.13 – seems to be wording missing from first line of paragraph.

Policies 3-8 – as the Village Design Statement is referenced on several occasions, should this be incorporated or appended to the NP? Also, reference should be made to the Wychavon Residential Design Guide SPD (September 2010) in supporting text. In addition to this, references to the VDS and Conservation Area Appraisal should be dated (see Para 5.28).

Policy 5 – uPVC windows can be installed under Permitted Development Rights, so NP can't specify otherwise.

Policy 9 – principle is supported, however name of designation may cause confusion. Local Listed Buildings could simply mean buildings with existing listed status in the locality rather than heritage buildings that are not listed but are being afforded additional weight in the NP. It is therefore suggested that the name of the designation is changed to something along the lines of 'local heritage assets' for clarity.

Policy 11 – should also be reference to emerging policy SWDP10 at Para 5.35.

Policy 13 – the listed Local Green Spaces do not directly correlate with Map B. There are more listed than there is mapped? If these were referenced (e.g. LGS1, LSG2 etc.) at both policy 13 and on Map B, it would be much easier to read and understand.

#### Appendix 4

- Table 4 is rather confusing, for example 'Child 3' had 1 x 0-4 year old, 1 x 5-10 year old and 2 x 10-14 year olds; yet 3 of those are living at home and working or unemployed? Also, the age brackets are an issue – where does a 10 year old stand?
- Table 7 is similarly confusing, not sure how differentiating between Person 1, Person 2 etc. is useful?
- Table 8 is not very user-friendly – should the options be ordered by response rate to show which are most and least common?
- Number of questions? 1, 2, 3, 4, 5, 7, 8, 9, 11, 13, 15...? Subsequently, questions which refer to one another are incorrect – for example Q28 refers back to Q21 which is actually Q27 and Q41 refers back to Q31 which is actually Q39?

### **Jem Teal – Community Development**

Although the document recognises the importance of the playing fields, it could potentially highlight the need to expand the recreational area as it is insufficient to meet the needs of both football and rugby (as evidenced by the Wychavon Playing Pitch Strategy). Although a satellite pitch is being used for long term sustainability, this really needs consolidating on one site.

### **Elaine Artherton – Conservation**

Much is made of the Conservation Area appraisals for Bredon and Bredon's Norton which is positive, however the map used to show the Bredon Conservation Area is out of date.

[http://www.wychavon.gov.uk/documents/10586/157693/wdc-planning-her-bredonadoptedappraisaljan\\_08.pdf](http://www.wychavon.gov.uk/documents/10586/157693/wdc-planning-her-bredonadoptedappraisaljan_08.pdf)

## **Lynn Stevens – Parks and Greenspace**

No comment from a Parks and Open Space viewpoint as the parish manages its own green spaces.

## **Eileen Marshall – Landscape**

I have considered in particular policies that relate to landscape issues – policies 2, 6, 8, 13 and 14. The approach to landscape issues is generally well-considered.

One query/concern that I do have is in relation to Policy 14, specifically the last three words of the second and third paragraphs. These paragraphs state:

*Proposals that will have a detrimental impact on traditional orchards, veteran trees, woodlands, wetlands, wildlife corridors and protected natural heritage sites, in particular on UK Biodiversity Action Plan (BAP) or Local Biodiversity Action Plan (LBAP) habitats and species in the parish will be refused.*

*Proposals that will have a detrimental impact on long-established hedgerows which are visually prominent (especially along the main approach road within the parish) or which are important for biodiversity, will be refused.*

This ‘will be refused’ approach ties our hands even with applications that (in exceptional circumstances) may be considered acceptable to Wychavon officers. Alternative wording ‘will not generally be supported’ is more appropriate.

Otherwise, I am generally supportive of this document.

## **Cherrie Mansfield – Strategy and Communications**

Objectives at Paragraph 5.2 and Local Priorities at Paragraph 6.6 – the Parish Council could use some of its New Homes Bonus allocation to help deliver some of these.

Policies 3 and 4 – it would be good to see a more proactive approach to sustainable construction and renewables in these two policies.

Paragraphs 6.4 and 6.5 – encourage the Parish Council to submit nominations to Wychavon for the mentioned sites to be listed as Assets of Community Value. Simply including them in the NP will not get them listed; they will need to submit nominations.

## **Jonathan Edwards – Development Manager (South)**

Policy 2 – the Local Gap includes the site proposed for housing development by Gladmans (W/13/02148/OU outline application for up to 98 dwellings that was refused and subsequent appeal was dismissed) – expect an objection from the applicant.

Policy 4 Part 3 – criteria is confusing, does this mean floor area or footprint? From a Development Management perspective, there is an objection as it is arbitrary (why 50% and not 60% or 90%?), and without proper definition of how measurements are to be taken makes it difficult to properly assess schemes against this policy. This approach has been taken in the past with regard to extension to houses in the Green Belt – it became a very cumbersome policy to impose and to assess schemes against, often with no real meaningful purpose.

Policies 4 and 5 could easily be grouped as they are similar.

Policy 6 – a lot of works in private gardens is permitted development, e.g. laying of paths, planting, domestic lighting and signs. Policy does not reflect that PD rights exist.

Policy 9 – this should be expanded, so where a building is locally listed, what does this designation afford the building in terms of protection? It should also be noted that this designation cannot give the same weight as Listed Buildings, otherwise it would be in conflict with the statutory listing process.

Policy 13 – if this policy is aiming to attach equivalent Green Belt status to local green spaces, it has to be acknowledged that Green Belt policy defines certain types of development as being appropriate. Also I am uncertain sure Para 77 of the NPPF states that local green spaces should be subject to green belt policies. Also it does state that Local Green Space designation will not be appropriate for most green areas or open space – given this context, what is the justification for allocating so many in the NP.

Policy 14 – this policy goes a step further than the NPPF in stating that proposals that will cause harm will be refused. NPPF Para 109 talks about minimising the impacts, and Para 113 talks about distinctions being made to hierarchy of designated sites. Para 117 and 118 are also relevant.

Following your consideration of the consultation responses, Wychavon look forward to progressing the Submitted Neighbourhood Plan and associated documentation with the Parish Council. In particular, we will need to discuss the identification and selection of an independent examiner prior to formal submission.

Kind Regards,



Reiss Sadler

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**From:** Dobson, Jane  
**Sent:** 04 December 2015 10:48  
**To:** Sadler, Reiss  
**Subject:** Bredon Draft Neighbourhood Plan out to consultation

Hello Reiss, my comments are that we will support both economic development policy statements, Policy 11: Local Shops & Commercial Premises and Policy 12: Local Employment. New business grant funding opportunities and business support will be available in 2016 for business start ups and growth businesses, as well as funding for specialised projects. The LEADER Rural Small Capital Grants Programme is also now open for small business, tourism and farm diversification projects to increase economic benefit in rural areas.

Thanks  
Jane

**Jane Dobson**  
**Economic Development Officer**  
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01386 565278  
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[www.wychavon.gov.uk](http://www.wychavon.gov.uk)





**From:** Sadler, Reiss [<mailto:Reiss.Sadler@wychavon.gov.uk>]  
**Sent:** 18 March 2016 09:16  
**To:** Bredon Parish Clerk  
**Cc:** Ford, Andrew  
**Subject:** Bredon Parish Neighbourhood Plan - Pre-Submission Draft Consultation Response

Dear Jacqueline,

Many thanks for allowing us to comment on the second Bredon Parish draft Neighbourhood Plan.

We are pleased to see that the issues raised by Wychavon District Council in the previous consultation have been addressed.

We only have the following comments to make to this consultation:

- All references to the Wychavon District Local Plan can now be removed. When the SWDP was adopted on the 25 February, the WDLP was wholly superseded. The SWDP holds full planning weight, even in the legal challenge period up to 6<sup>th</sup> April 2016, until such a challenge is lodged and accepted by the High Court.
- Because of the above point, many of the maps shown (Plan B-F and H, for example) are out of date. Once the SWDP mapping is finalised, we will organise copies of these maps to be produced showing the up-to-date SWDP layers (i.e. SWDP2 Development Boundary etc.).

If you have any queries, please do not hesitate to get into contact with myself or Andrew Ford.

Regards,

Reiss

**Reiss Sadler BSc (Hons)**  
Planning Officer (Policy)  
Wychavon District Council  
Civic Centre  
Queen Elizabeth Drive  
Persore  
WR10 1PT  
Tel: 01386 565 430

## **Part 2. Local residents & stakeholders**

Arranged alphabetically by surname or business name



**From:** mike Barrett [REDACTED]  
**Sent:** 24 October 2015 20:52  
**To:** [Bredonpc@btconnect.com](mailto:Bredonpc@btconnect.com)  
**Subject:** Draft Neighbourhood Plan

Good evening,

A very thorough and well thought out Proposal.

I have a few comments, mostly minor:-

1. Pages 12,13,14 It is impossible to read the legends on the scanned documents
2. Page 22, S5.2. Should you add the village halls to the last bullet point?
3. Page 25 S5.11. Add Bredon's Norton?
4. Policy 13, Local Green Spaces. The green space in Bredon's Norton between Inshallah and Manor Farm/ Norton Park is not mentioned.

Regards,

Michael Barrett  
[REDACTED]

From: Vicki [REDACTED]  
Sent: 31 December 2015 15:00  
To: [Bredonpc@btconnect.com](mailto:Bredonpc@btconnect.com)  
Cc: Kevin Falvey  
Subject: Neighbourhood Pre-submission Plan

Sirs

My husband and I have studied the above and have noted it's comments.


We thought that the Maps could have been overlaid for better clarity and certain points could have been "bullet pointed" with links to more specific comment.

What happens after the Parish Meeting we wonder?

We would like to attend the Parish Meeting when this will be discussed but understand that this has been postponed. We would appreciate notification of a new date.

We thank Councillor Kevin Falvey for his continued enthusiasm with regard to the Plan and his keenness to ensure that as many people in the Parish as possible should read it.

Vicki Clift  
Sent from my iPad



12<sup>th</sup> April 2016

Ms Jacqueline Shields  
Bredon Village Hall  
Main Road  
Bredon  
Tewkesbury  
GL20 7QN

**Re: Bredon Neighbourhood Plan Pre-submission Consultation**

Dear Ms Shields,

I fundamentally oppose this pre-submission version of the Bredon Neighbourhood Plan.

I understand that all the land marked designated Local Green Space or Local Gap is in private ownership and that no landowners were contacted at any stage for consultation by Bredon Parish Council which fails to follow the national planning policy.

Bredon has an ageing community and higher house prices than surrounding areas and therefore, will need housing land in the future to maintain natural growth of the population and a younger community to feed the school and keep a correct balance of age groups maintaining a vibrant village. I understand Bredon P.C. suggested that the 100 houses which will be needed by 2030 could be "in-fill" within Bredon. This is simply impossible and even if it was, no social or affordable housing would be attached to it. It is vital that some land around the village is designated for a housing reserve area.

This Neighbourhood Plan cannot go ahead in this form and must be re-thought in its entirety before continuing.

Yours sincerely



T. F. Cook

**From:** Malcolm Dunn [REDACTED]  
**Sent:** 03 December 2015 21:24  
**To:** [bredonpc@btconnect.com](mailto:bredonpc@btconnect.com)  
**Subject:** RE: Bredon Parish Neighbourhood Plan consultation

Dear Jackie, few comments on the pre submission plan:

### Specific

- Very comprehensive and well thought out document so thanks to the Neighbourhood Planning Group for no doubt a lot of hard work in pulling this together. It captures a lot of valuable evidence on Bredon Parish and input from its residents
- Intro paragraph of Policy 10 Community Facilities... (p32) seems unnecessarily restrictive to potential change / enhancements
- Policy 13 (p35) – wording “.....except in very special circumstances” should be deleted.
- Section 6 Implementation – good to see specific reference to Assets of Community Value and Infrastructure Projects. Would benefit from some wording on how the general community will remain involved at this stage of the plan.
- Stakeholder consultation – the ‘stakeholder letter’ should have listed the key stakeholders being consulted. It would have clarified whether the response was wanted from an individual or an organisation. As this was not clear I am simply giving my own personal feedback. I would also not want Bredon Community Play & Recreation listed as a key stakeholder that had been consulted due to the lack of clarity on who was being consulted.
- Public consultation on the pre submission plan – it would have been better to also offer a public meeting when the plan could have been presented and feedback captured from those attending

### General

- Neighbourhood Plan – it feels quite a ‘clinical physical planning’ document but I presume that is due to the legislation / regulation guiding it.
- It would benefit from an Executive Summary / Abbreviated version for general public to engage with more easily. Again maybe this is not possible due to the legislation / regulation guiding it.

Thanks Malcolm Dunn, [REDACTED]

**From:** Malcolm Dunn [REDACTED]  
**Sent:** 13 April 2016 21:31  
**To:** [bredonpc@btconnect.com](mailto:bredonpc@btconnect.com)  
**Subject:** RE: Bredon Parish Neighbourhood Plan consultation (6 Mar to 17 Apr 2016)

Updated draft plan is well considered and overall the policies make a lot of sense. Hopefully the final plan will be given the weight / recognition it deserves when any planning proposals occur in the years ahead.

Thanks Malcolm Dunn



27<sup>th</sup> March 2016

Ms J. Shields

Bredon Village Hall

GL20 7QN

Dear Jackie,

Thank you very much for the loan of the hard copy of the Bredon Parish Neighbourhood Plan. Having initially read the plan on line, I found it much more useful to have the hard copy, and it was so much easier to cross-reference items. In addition, the maps were more easily read.

On page 22, section 5.2, is it possible to add "sports' facilities" to the final bullet point, as these are considered important in the rest of the document?

Also, on page 39, in the paragraph headed "Assets of Community Value", can we mention "Bredon Cricket Club", as this is situated separately from the Bredon Playing Field, (although the Cricket Club used to have their ground there)? We had over 300 members last season, although not all were playing members.

I was unable to determine the difference between the "Local Gaps", mentioned on page 25, and the "Local Green Spaces" mentioned on page 37. The Policies Maps A and B on pages 63 and 64 were also very informative.

At the end of the consultations, and if everyone else has a hard copy, I would very much value one to keep if there are any spare. The whole document shows immense planning and attention to detail; I really enjoyed reading it thoroughly and would wish to compliment everyone concerned with its production.

With very best wishes and many thanks.

Yours sincerely



Derek A. Ebbage

**From:** Melanie [REDACTED]  
**Sent:** 09 November 2015 14:16  
**To:** 'Clerk'  
**Subject:** Bredon Neighbourhood Plan

Dear Jackie

Please pass on our thanks to everyone who has put an immense amount of work into preparing the Bredon Neighbourhood Plan.

We have a few comments we would like to make:

1. Plan B on page 10 does not appear to show the current boundary of the conservation area. We think this is because this map is to indicate the policies that are out of date, but think the caption might be misleading when it says Proposals Map of Bredon. (The same goes for the maps on subsequent pages.)
2. Are the GD1 boundaries going to be reviewed? If so, would it be appropriate to include a map showing the proposed development boundary (e.g. GD1) and the conservation area boundary?
3. The local green space map on page 40 does not include some notable green spaces in Bredon, e.g. the glebe field and the field between Oak Lane and Farm Lane (we call this The Furlong). Is this because they are in the conservation area? This is not clear.
4. Please can we you send us a copy of the following reports:
  - Analysis of Key Views and Local Green Space in Bredon Parish
  - Analysis of Strategic Gaps between settlements in Bredon Parish

Please can you acknowledge receipt of this email.

Many thanks and best wishes  
Melanie and Carl Gray

Melanie Gray [REDACTED]  
[REDACTED]  
[REDACTED]

**From:** Hill, Andy (Programme Director Global Payments) [REDACTED]

**Sent:** 29 October 2015 13:59

**To:** [Bredonpc@btconnect.com](mailto:Bredonpc@btconnect.com)

**Subject:** pre submission draft

Having reviewed the document the only comment I have is that the map used in plan d for Kinsham is incorrect on its marking of the boundary. Both Stonewold and little orchard extended the garden by purchasing land from Darby. This has subsequently been built on in the case of little orchard with a new property. The development boundary therefore should be reviewed.

**Andrew Hill**



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**From:** chris [<mailto:chris@bredonpc.btconnect.com>]  
**Sent:** 31 March 2016 15:03  
**To:** [bredonpc@btconnect.com](mailto:bredonpc@btconnect.com)  
**Subject:** Bredon Parish Plan Consultation 2016

Dear Sir/Madam,

I am a resident in Bredon and have been studying the Bredon Parish Plan carefully to see how it will affect the village in the future, with special regard to cycle routes and transport links to surrounding sources of employment such as Tewkesbury, Ashchurch and Pershore.

While the traffic situation is not critical in Bredon at the moment, with the inevitable rise of many more housing estates in the area, I believe it would be a wise decision to start investing in dedicated cycle paths (not ones shared with walkers or other road users) which would bring benefits to both Bredon and surrounding areas.

Currently the "cycle route" to Tewkesbury is dangerous and involves travelling out of Bredon on a 60mp/h road (B4079) until you come to the lane behind Ashchurch Army Base (Aston Fields Lane). This road is increasingly used as a cut through for people wishing to avoid the Ashchurch traffic at rush hour, the narrow nature of the road and increase in traffic makes it unsuitable as a useable cycle route. I myself try not to cycle in or around the village due to the number of near death experiences I have encountered, which naturally saddens me.

The complete lack of visible cyclists in or around Bredon is testament to the heavy use of cars which pollute, congest and discourage people from building exercise into their everyday lives. The lack of public transport links (I understand there is a bus, however it is hard to use for those in full time employment) mean that the village has become overburdened with cars just for short trips into Tewkesbury.

The addition of new **dedicated** cycle paths (I can't stress the dedicated part enough), would doubtless increase tourism from surrounding areas to the village (for those on a nice Saturday afternoon cycle ride), encourage healthy lifestyles through exercise, reduce cars, get more children outside (I don't know where the under 18's go, but they only seem to come out for the school bus in the mornings), and hopefully encourage further use of local amenities within the parish.

In Appendix 5 of the Bredon Parish Plan, Question 5 (p.51) shows that no-one in the village cycles to full-time education. I can understand this, as I would not want a child travelling along 60mph roads, or through the village at rush hour on the main roads.

In the same appendix, Question 16 (p.56) brings up the notion of linking different villages. Whilst I am encouraged to see the addition of a cycle path idea in the survey, the lack of employment or shopping amenities in those villages means those paths would only be used for recreation. Cycle paths to larger conurbations, will be encourage people to cycle to the supermarket, their work, recreation, meeting friends in town etc.

Within the Parish Plan itself, the only reference I can find to cycle paths is on p.39 under 7.6 Infrastructure projects, where it enjoys a lowly bullet point at the end of the plan. Is there more detail yet to come on these cycle paths? (i.e. where they would go, what they would connect, who would be the key demographic for their use)?

I truly believe that if Bredon invested in dedicated cycle paths linking it with **larger** conurbations, it would have many benefits (of which I have outlined only a few above) and would see Bredon become a more environmentally friendly, less congested village of the 21st century.

Yours faithfully,

Christian Jenkins

--

Christian Jenkins

[Redacted signature]

[Redacted signature]

From: Thomas Carr [REDACTED]  
Sent: 09 December 2015 15:10  
To: [bredonpc@btconnect.com](mailto:bredonpc@btconnect.com)  
Subject: Bredon Parish Neighbourhood Plan

Dear Sirs

Thank you for including us as key stakeholders in your parish plan.

It is a honour and a privilege to provide a veterinary service to the parish.

I have looked through the plan and feel you have worked actively on protecting the character of Bredon and would comment it seems sensible and well thought out.

Any chance of some street lighting for Station Drive? And any way of making it safer to turn right /cross the road at the junction opposite Station Drive,as the traffic is always quite fast going through the village at this junction,and visibility is poor for the drivers coming up to the junction from Pershore.

Kind regards

Tom Carr BVMS GPcert(SAM) MRCVS for Martin and Carr Vets

**From:** Sally Offord [REDACTED]  
**Sent:** 04 December 2015 16:55  
**To:** [bredonpc@btconnect.com](mailto:bredonpc@btconnect.com)  
**Subject:** Public Consultation on the on the Pre-submission draft

Good Afternoon

We have read the details published on the Bredon pc website and fully agree with content of the above proposal.

Yours sincerely

S & S Offord



1<sup>st</sup> Dec. 2015

Dear Jackie,

### Bredon Parish Neighbourhood Plan

This is a well reasoned And presented document but we would like to add the following comments:

Para 1.3.4 Perhaps change the wording to 'St. Giles Church is listed as Grade 1 as also is Bredon Barn which is owned by the National Trust

2.2.4 Fig.3 This photograph is unfortunate as it portrays a high speed road. It should concentrate on the open land by the roadside

3.8.3 Double yellow lines on one side of the road is the answer. Without these the drivers will park where they think fit.

3.8.6 As footpath warden, I am very conscious of disabled people having access to the countryside. On this occasion I am referring to fp 527/525/522 and 508 These footpaths lend themselves to

Wheelchair and pushchair access. However, there is a problem with the stile on junctions of fp 525/522/ and 508. The County Council's policy is to place RADAR gates at fp boundaries. At no cost to

the Landowner the CC would supply and fit RADAR gates. The stile could replace the hooped gate on the permissive path just north of fp 508. English Nature agrees with this solution.

3.10.4 Fig.19 The photograph is out of date. The children's play area has now been moved and a MUGA installed in its' place

3.10.5 Worcestershire residents should not be encouraged to use Stoke Orchard Landfill. The one we should use is Throckmorton (not really much further to travel)

4.3. Para k/ As fp warden to my knowledge, all footpaths are open. They may be a little wet underfoot but that is country walking. I would appreciate if this statement is reviewed

5.5.2 Your statement says 'whilst it is recognised that problems are caused by a small minimum of drivers' - should read 'by a majority of drivers (they don't care)

Perhaps maps A and B could be better referenced to the text.

Would the presentation of the report be improved if it were presented as Part A as Historical and Part B referred to requirements

**From:** [REDACTED]

**Sent:** 13 March 2016 00:01

**To:** Bredon Parish Clerk

**Subject:** proposed plan for bredon

Good morning. I have enquired about the plan in the past and was shown plans that meant the field opposite my house in Jubilee drive would be part of the parish plan and would be a local green area. I now see this has been changed in the new proposed plan. I would like to know who proposed this change and why it has happened as I feel this has serious implications, the reason being planning permission has been given for 24 houses in the adjacent field. What protection does this give to the field i.e. what is to stop the same land owner now putting in request to build on the field. This was agreed to be a local green area why has the council changed its mind.

regards

Terence Overton Short

From: Marg Plain [REDACTED]  
Sent: 09 January 2016 11:33  
To: [bredonpc@btconnect.com](mailto:bredonpc@btconnect.com)  
Subject: Parish Plan consultation response

Dear Councillor's,

Thank you for the opportunity to comment on the Bredon parish plan. It was only the fact my Daughter saw the banners in the village that I knew that a parish plan was being developed.

This brings us to our first point around lack of engagement in parish matters for the residents of Kinsham. I think the extremely low response rates (3.48%) demonstrates that the PC have not actively communicated or consulted the residents of the hamlet. I noticed that the response rate for the other smaller villages is also low. The PC need to consider whether they are providing the necessary service to these smaller villages. Or is it because the people in these villages have no sense of belonging in the Parish. An objective of the plan should be to ensure a sense of inclusion for all of the parish villages and not just Bredon.

Overall the plan itself has been well put together and it's overall content is well thought through. There are several points that I would like to raise that aren't necessary directed for the plan, but more on overall points raised in the plan:

- I noticed that the conservative area status for Kinsham hasn't been reviewed since it was designated in 1975. Much has changed in this time not least the designation criteria and the feel of the village.
- there is no opportunity for people wanting to stay in the village because of local connections to do so because there is no provision of suitable housing, either affordable for first time buyers or people wanting to down size.
- a small number of new developments in the village would be welcome, it would be nice for the villagers to have an opportunity to discuss the location of optional development sites with the PC e.g there is a plot down Lower Lane that has just become overgrown because it has no worth and cannot be used for a dwelling. It looks a mess and we would much rather it be a well looked after dwelling.
- the quality of the Lower Lane surface is appalling and is regularly covered with damaging surface water.
- the verges down Lower Lane are never maintained during the growing season.

We once again thank-you for the opportunity to comment on the plan and are happy to discuss these matters further with you.

We look forward to your response.

Kind regards,

Keith & Margaret Plain

Sent from my iPad

**From:** Madeline Reeder [REDACTED]  
**Sent:** 10 April 2016 17:50  
**To:** [bredonpc@btconnect.com](mailto:bredonpc@btconnect.com)  
**Subject:** Comments on Parish Plan

It would be wonderful for the Parish to have a significant number of new housing units. It would provide a positive energy by introducing new families into this area. The Churches , schools and businesses would all benefit.

An obsession with maintaining the status quo will only lead to stagnation and a decline within the Parish. There is a desperate need for more housing across the land. We should step up and do our share and stop all the rhetoric.

Regards,  
M Reeder



From: Jenny Stephens [REDACTED]  
Sent: 18 April 2016 11:46  
To: [bredonpc@btconnect.com](mailto:bredonpc@btconnect.com)  
Subject: Neighbourhood Plan

Dear Jackie,

I would like to endorse the neighbourhood plan for Bredon parish and think that the residents will benefit from it's proposals in future years.

Yours faithfully Jennifer Stephens .

[REDACTED]

From: [REDACTED]  
Sent: 03 November 2015 09:32  
To: [bredonpc@btconnect.com](mailto:bredonpc@btconnect.com)  
Cc: [aihardman@worcestershire.gov.uk](mailto:aihardman@worcestershire.gov.uk)  
Subject: Comments on BREDON PARISH NEIGHBOURHOOD PLAN

## BREDON PARISH NEIGHBOURHOOD PLAN

### Comments:

We would like to make the following comments concerning the Bredon Parish Neighbourhood Plan.

#### Comment 1

**The plan used to define the boundary of the Conservation area in the Bredon Parish Neighbourhood Plan (page 10) is dated 2005 and is not the current approved plan. The up to date plan in the VILLAGE DESIGN STATEMENT includes the area between Oak and Farm Lanes.**

**See VILLAGE DESIGN STATEMENT -- APPENDIX 5.2 BREDON CONSERVATION AREA - page 69**

**Please use the up to date plan shown in the Village Design Statement - reference Bredon Conservation Appraisal - Plan dated January 2008**

#### Comment 2

Policy 2: Local Gaps and Key Views.

Previous documents published by Wychavon Planning Department relating to key features of the village have included the view over the parcel of land between Farm and Oak Lane. This is the view from the top of Oak Lane (in the vicinity of the last house) looking north-west towards the church - it was regarded as a view of merit. As far we can see, there is no mention of this in Policy 2. It should be included on the plan.

Shouldn't this be included with Policy 2 notes - 5th bullet point. Views of St Giles Spire and Bredon Village?

Similarly, to include this point, the area designated at GR9 on the Local Green Spaces plan should be extended northwards to embrace the area of unallocated land between Oak lane and Farm Lane.

The parcel of land was brought into the Bredon Conservation Area in 2007/08 for several reasons, that included archaeological / historical, and visibility, and was considered in 2010 as being unsuitable for development. Quote from the Bredon Conservation Appraisal 2007/2008:

1. A surviving remnant at the southern fringe of the village, between Oak Lane and Farm Lane, is the only tangible reminder in the village of this period of early settlement activity in its history and is an important feature of the conservation area.
2. New peripheral developments restrict outward views of the countryside from the conservation area to occasional views and glimpses.....In other parts views outward are limited to those of farmland to the south from Oak Lane,.....

This parcel of land should also be included in Policy 13 - Local Green Spaces of the Parish Neighbourhood Plan.

#### Comment 3

At the recent Planning Enquiry regarding the proposed large development on the south west side of Bredon adjacent to the Tewkesbury Road, much emphasis was passed about the open views of Bredon's historic centre on this side of the village, both from the National Trust and English Heritage. Similarly, evidence was promoted that showed the open views from the M5 Motorway. In view of all this recent evidence should not the land on the west side of Tewkesbury Road be included on the Local Gaps Plan by extending Gap 4 northwestwards - on the east side of the motorway?

#### Comment 4

Policy No. 7 - Design of Roads and Footpaths.

Perhaps a note should also state that the design **and use** of roads and footpaths should comply with current Highways legislation.

#### Comment 5

6.4 on page 38

Shouldn't Bredon Village Hall Complex and Bredon's Norton village Hall be included in this list?

#### Comment 6

We see no mention of the land between the churchyard and the entrance to St. Giles Road (Glebe Field?) -- Isn't this a Parish Council owned asset?

#### Comment 7

We see no mention of the 'under five's play area' on Cherry Tree -- Isn't this a Parish Council owned asset?

#### Comment 8

Infrastructure projects - page 37.

There is a large area of land to the south of Bredon Village on the west side of the railway with no public access. Why doesn't this system of farm roads have permissive rights of way status for all to enjoy. If Overbury Estate can do this on their land - why not here?

More could be done to encourage cycling in the area (apart from Bredon Hill). The footpath that runs due south on the east side of the railway could be up-rated to a cycle way and connect to other routes further south -- even giving direct, and safe, cycling access to Ashchurch railway Station - consult Sustran?

Robert and Margaret Vernon

[REDACTED]

**From:** [REDACTED]  
**Sent:** 12 March 2016 20:15  
**To:** Bredon Parish Clerk  
**Subject:** Neighbourhood Plan

Thank you for the updated Bredon Neighbourhood plan.

I think I still have an issue with Plan B on page 11 not being accurate. I can see that you have tried to cover this with a reference to Bredon Conservation Area Appraisal 2008 -- but I don't think that this goes far enough and the full accurate conservation area should be shown. From some 40 years of experience with maps, plans, charts etc -- when a person looks at a map they tend to take it as accurate -- they never bother / have the time, to check source material. In fact I am not sure how legally valid the Neighbourhood Plan would be, if true and accurate information is not depicted - perhaps you would like to check this point?

The sentiment in which the area between Oak and Farm Lanes was added to the Conservation area in 2008 is valid -- ridge and furrow / views etc., as it offers token protection to the original landscape that once surrounded the village - much of which has now been eroded by development. You have in previous documentation indicated that this area is at Low Risk from development because of its inclusion in the Conservation area. However, I would query the fact that the Parish Council have not included it as Local Green Space, because that is what it is if it is in the Conservation area.

Viz policy: - 6.39 This policy designates and protects green areas or open space within and adjoining built up areas as Local Green Space. These are areas which are demonstrably special to the local community and hold a particular local significance, for example because of their beauty, historic significance, recreational value, tranquillity or the richness of their wildlife.

I think by definition that the area between Oak and Farm Lanes falls into this category as outlined in Bredon Conservation Area Appraisal 2008.

On another matter -- the Neighbourhood Plan does not mention caravans other than the fact that in the survey a clear majority object to them. In view of the impending issues that may arise because of the proposal for a traveller site on the Westmancote side of the village should not reference be made to local neighbourhood policy on caravans in the neighbourhood plan - whilst some may argue that the issue at Westmancote is different -- I am of the opinion it isn't -- some areas of Bredon do have covenants in the the title deeds of their property forbidding caravans -- and a good thing too!

Regards

Robert Vernon (Dr)  
[REDACTED]

**From:** [REDACTED]  
**Sent:** 11 November 2015 09:48  
**To:** [Bredonpc@btconnect.com](mailto:Bredonpc@btconnect.com)  
**Subject:** Parish Neighbourhood Plan

Hi Jackie,

I'm probably too late but I did find a couple of typos (and a comment regarding estate agent signage - that's about it) in the Plan.

Please find attached.

Thanks

Jim Verrechia

**From:** P.F.Whitehead [REDACTED]  
**Sent:** 12 April 2016 10:19  
**To:** [REDACTED]  
**Subject:** various

[REDACTED]

[REDACTED]

[REDACTED]

I recently scanned over your entirely admirable NP and there were one or two matters picked up on which probably should be tidied in the interests of exactness. I don't have it in front of me but in or about 2.4 Croft Farm Lake is not on the river floodplain but above it in terms of how floodplains are defined – you could get round this by saying 'close to' or 'in the low valley of' etc etc. At 6.8 or thereabouts the word 'propagation' is employed but it is not clear whether another word such as for example 'cultivation' is intended. Certainly top fruit propagation was undertaken on an almost domestic scale in recent historic time but it was not clear if that was the intended word.

On the question of the NP you may be able to help me briefly on what formal process had to be employed to amalgamate two administrative areas (parishes) into one common document. Did this require special dispensation in terms of the Local Authority, Local Plan, the SWDP or the Localism Act itself or were the two parishes able to establish a common understanding within the stated provisions of the Act? Basically the question is what tools were required to enable this?

Kind regards

Paul

=====

P. F. Whitehead

[REDACTED]

=====

### **Part 3. Landowners & their representatives**

Arranged alphabetically by surname or company name



Highfield House, 5 Ridgeway, Quinton Business Park, Birmingham B32 1AF  
T +44 (0)121 213 5500 F +44 (0)121 213 5502 E [rpsbm@rpsgroup.com](mailto:rpsbm@rpsgroup.com) W [rpsgroup.com](http://rpsgroup.com)

**Our Ref: JBB7404.C4388**

**E-mail: [Tim.Watton@rpsgroup.com](mailto:Tim.Watton@rpsgroup.com)  
Date: 16 April 2016**

**By email and post**

[bredonpc@btconnect.com](mailto:bredonpc@btconnect.com)

Ms Jacqueline Shields  
Bredon Village Hall  
Main Road  
Bredon  
Tewkesbury  
GL20 7QN

Dear Jacqueline

### **Bredon Neighbourhood Plan: Pre-Submission Consultation**

Thank you for the opportunity to comment on the above document, which is made by RPS on behalf of our client Barratt West (BW).

It is apparent that the Parish Council has undertaken a significant amount of work to get to this stage of preparation and it is encouraging to see a level of detail within this Plan. BW does, however, have a number of concerns with the Parish Council's approach which requires amended in order for the Neighbourhood Plan (NP) to meet the basic conditions and proceed to public referendum.

### **Policy NP1: Spatial Plan for the Parish**

A number of clarifications are sought in order to make this policy consistent with the South Worcestershire Development Plan. In doing so, the NP must ensure that it remains sufficiently flexible in order to deliver the aspirations for growth set in the higher tier plan and demonstrate that the plan can deliver sustainable outcomes for the NP area.

The current iteration of the policy indicates that the NP will support the recently adopted allocation in Bredon, however any other development proposals outside the village boundaries will be strictly controlled. The plan does not explicitly identify development boundaries for any of the settlements and as such, the Parish Council's intentions in this regard remain uncertain. What we do know is that the Parish will need to deliver more growth than simply the recently allocated site and so the Parish Council will need to carefully consider how to proceed in this regard.

### **Policy NP2: Local Gaps and Key Views**

BW has a number of concerns with the mechanics of this policy, however the principal concern is the strategic relationship of the NP to higher tier planning documents prepared by district authorities.



Section three of the NP does outline the current spatial planning context for Wychavon District, including the recently adopted South Worcestershire Development Plan (SWDP), covering Bredon Parish as part of Wychavon District. There are, however, some important provisions in the SWDP which have not been properly accounted for in the NP.

As part of the SWDP preparation, it was necessary to consider the relationship of emerging plans adjacent to the South Worcestershire authorities and whether there were any concerns over housing supply in these areas. In particular, the relationship of the SWDP to the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) was taken under consideration by the SWDP Inspector as part of the examination process.

At the time of consideration, the SWDP was in a more advanced stage of development than the JCS, which had not outlined any unmet need arising in the District. That being said, the Inspector recognised the need for the SWDP to be sufficiently flexible and hence retained an important footnote within SWDP development strategy and spatial hierarchy. Policy SDWP2 (I) outlines that consideration will be given to the housing needs of the JCS should the emerging document find that housing outside the JCS boundary is required.

Of Importance here, the footnote makes reference to Land at Mitton in direct reference to this policy, highlighting the significance of the site in the event of unmet need from the JCS area. This site, as considered by the SWDP Inspector is identified by the NP as GAP 5 within emerging policy NP2.

The National Planning Practice Guidance (NPPG) is clear that a NP should support the strategic development needs set out in the Local Plan and plan positively for local development (paragraph 41-004-20140306 refers). Land at Mitton is an area considered as part of the SWDP and as such is referenced as a location for growth to meet potential unmet need arising from the JCS, having been identified as suitable, available and achievable in the Wychavon Strategic Housing Land Availability Assessment.

A potential conflict therefore exists with the NP and the higher tier strategic policies adopted in Wychavon District. As the Parish Council recognises (paragraph 3.3), the NP must be in conformity with the strategic policies of the local plan, a requirement which is set out as one of the basic conditions that have to be met in order for the NP to proceed to referendum.

As currently drafted, Policy NP2 would constrain and frustrate the ability for future development on Land at Mitton which may conflict with the emerging JCS, should evidence indicate unmet need to be met within South Worcestershire.

In order to avoid this potential conflict and ensure that the NP can proceed to referendum, it is recommended that Land at Mitton is removed from the list of Local Gaps, with reference to Policy NP2 and Policies Map A.

### General comments

As currently drafted, this policy is quite confused. It appears to conflate issues of coalescence and landscape character, two issues which are very much separate issues and defined in different ways.

In terms of the first issue, green gaps, DWH would encourage the Parish Council to look again at the policies within the SWDP to take a view on whether this policy is required. Of all the

settlements identified in the Parish, Bredon is the only settlement identified within the higher tier villages (categories 1-3), promoting a permissible approach to development under Policy SWDP2. Other settlements are characterised in SWDP2 as lower category villages, suitable only for smaller infill development.

As the SWDP has already set out a wider strategy for where development should be located in the district. This would be an opportunity for the Parish Council to use this hierarchy to plan positively for growth, using the NP as a means to do so. Presently, the plan only makes reference to the allocation of 24 dwellings committed through the SWDP. Though the NP includes a requirement for 125 dwellings over the plan period, the NP makes no attempt to allocate additional sites.

In order to safeguard areas from development, it would seem prudent to first identify where potential development could come forward to meet the dwellings that the NP has identified for the NP area. Logically, the assessment of green gaps would follow the identification of key areas for growth. In particular, the Parish Council may want to give consideration as to whether this need can be met on Land at Mitton, as a demonstrable location for sustainable growth.

### **Assessment of Local Gaps in Bredon Parish**

In support of policy NP2, the Parish Council has undertaken an assessment of green gaps, submitted alongside the consultation plan.

The methodology for the assessment identifies four tests for appraising sites for suitability as a green gap. It is unclear how many sites the Parish Council has appraised as part of this assessment, however five locations are included in the rear of the assessment, which have been transposed into Policies Map A of the NP. This would suggest that the Parish Council has not considered a range of sites as part of this assessment, only sites that it wishes to be safeguarded from development. This is quite concerning, as it indicates that the sites have driven the creation of the methodology, rather than the other way around.

#### **Test 1: Planning Permission**

The first test considers whether any of the identified sites have planning permission, or have been allocated for development in the SWDP. As indicated in the response to Policy NP2, BW considers that the NP should also account for land identified in the SWDP which may be required in the future to meet potential unmet need arising from the JCS area. It is therefore proposed that the second bullet point of the first test is amended to reflect this change.

It is of importance to note some of the recent observations made by the JCS Inspector as part of the examination of the plan:

- It has been identified that the OAN has increased;
- There needs to be a rebalance of distribution, including more growth to Tewkesbury
- Inspector has requested that the CJS authorities look at Tewkesbury both in and out of the JCS setting and give further consideration to potential options for sustainable growth around the town.

#### **Test 2: Extents of Undeveloped Land**

This test determines that a green gap will not be appropriate where an extensive area of undeveloped land separates settlements, which the Parish Council later qualifies as 1,000 meters.

It is unclear how the Parish Council has come to the view on the figure of 1,000m which appears to be unsupported by evidence. The 1,000m threshold is considered somewhat arbitrary in calculating the impact of neighbouring settlements and does not take into account local features which may obscure and limit the impact of settlement expansion.

It should be noted that GAP5 (Bredon's Hardwick to Tewkesbury) has not been excluded at this stage of assessment, as it is considered that the gap between the settlements is 720m on one side. The calculation of this figure is incorrect. Taken from Manor Park, which is the most northern extent of development within the identified parcel, it is over 1,400m to Bredon's Hardwick (taken from the properties at the junction of the B4080/Hardwick Bank junction. This figure would increase if development on the other side of the road was considered. The Parish Council have incorrectly appraised this site, which provides justifiable reasons for exclusion.

### Test 3: Coalescence and Settlement Character

This again seems to be an area where two separate features are placed together as part of one indicator. The methodology behind this test is not sufficiently robust in outlining how potential green gaps are to be assessed and leaves too much flexibility for sites to be inappropriately scored.

The first indicator of this test is to consider whether sites make a contribution towards separating settlements that are in danger of coalescing. This assessment has not taken into consideration the detailed findings of the SWDP in outlining a settlement hierarchy for growth and outlining what is considered to be suitable levels of growth for each settlement.

The claim is made that large settlements exert a larger gravitational effect on the hinterlands. The rationale behind this statement is unclear, as no evidence of a gravitational effect has been submitted as part of the evidence base for the plan.

### Test 4: Assessment of green gap on character

On inspection, it is unclear how this indicator differs from *Test 3* in a way that warrants a separate indicator. This test considers the impact on settlement character which has already been covered previously.

The second test proposed does clarify matters somewhat, noting that where little open space remains between settlements, it may be taken as read that this will exacerbate coalescence. In terms of the appraisal of GAP5, my response already notes that there is in excess of 1,400m between the two settlements. Even by the Parish Council's calculation there is a minimum of 720m, interspersed by agricultural fields and boundary vegetation. This does not qualify as little open space in accordance with the Parish Council's methodology and thus, the validity of the appraisal is questionable.

## Sustainability Appraisal

There is no legal requirement for NPs to undertake a Sustainability Appraisal (SA), however qualifying bodies need to demonstrate how their plans contribute towards achieving sustainable development. One way of doing this is to undertake an assessment of the impacts of the plan through a Sustainability Appraisal.

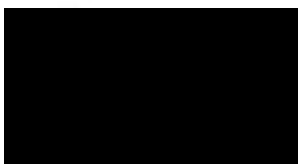
Paragraphs 3.19 and 3.20 of the NP confirm that the plan was screened against potential environmental impacts and Wychavon District Council considered that an SA was not required for the plan.

The benefits of an SA should not be overlooked however, as this provides a means of assessing what the potential impacts of a NP may be and contribute towards crafting a

As part of the evidence base for the SA, BW recommends that the Parish Council undertake an SA of the plan, which will be beneficial in demonstrating to the Inspector that the plan meets the list of basic conditions, required by the NPPG.

I trust the points made in this representation are clear, however further information on any of the issues raised can be provided at the Parish Council's request.

Yours sincerely  
for RPS



**TIM WATTON BA (Hons) Dip TP MRTPI**  
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cc.

enc. Land at Mitton Site Plan

SCALE: 1:2500 @ A0

REF: JBB7404  
CLIENT: Tewkesbury Land Consortium  
DATE: August 2014  
STATUS: Final

CHECKED BY: CAF  
DATE CHECKED: 14/08/14  
REVISION: 00  
PREPARED BY: JP

Bredon Parish Neighbourhood Plan: Consultation Statement, May 2016

FILE PATH =====> H:\Planning\Jobs Open\U887404\DTPI\Images\Illustrator

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10 April 2016

Mrs J Shields - Clerk Bredon Parish Council  
Bredon Village Hall  
Main Road  
Bredon  
Tewkesbury  
GL20 7QN

I am one of 7 people who own land off Cheltenham Road, Bredon (known as Bensham Allotments) for which we submitted an outline planning application for the erection of 33 dwellings, including 13 affordable homes (Ref W/13/01150/OU of 30 May 2013) This land is included in one of the 10 sites that the Neighbourhood Plan seeks to identify as Local Green Space.

I would like to register the following points related to the Bredon Parish Neighbourhood Plan for the reasons sighted below:

My first concern is that "Neighbourhood plans must show that Parish Councils or Neighbourhood Forums have properly consulted local people" The 2011 census shows Bredon Parish to have 1060 dwellings, so a response level of 237 equates to under a quarter of the village who were interested enough to respond. Additionally the figures show that of those who responded under 14% were aged under 40. This hardly shows a representative cross section of the age population of the Parish, indeed nearly half those who responded were retired.

Next I was interested in the statements that "During the second half of the 20th century, Bredon village experienced major expansion. The majority of this growth has been developer-led and unsustainably planned" "and "...residents are reliant on the towns of the M5 corridor for most of their work, shopping and recreational needs" In the time I have lived in the village, the number of food retail shops have fallen from 3 to 1, and the survey figures show that despite heavy investment in recreational facilities in the village nearly 70% of respondents do not use them. These facts seem at odds with the above statements.

I was also interested to see that the figures set out for FORECAST DEVELOPMENT DURING NP PERIOD (2016-2030). The figure for Projected windfall development in Bredon village (at same annual rate as 2007-2015) is 65,

but the 2007-2015 figure includes 28 houses identified as Orchard Close extension, the building of which went ahead despite fierce opposition from the Parish Council. Trying to replicate those figures to meet local demand for market and affordable housing 2016-2030 seems highly unlikely.

I notice on numerous occasions reference is made to the visual and cultural importance of "traditional orchards" Any viewing on Bensham Allotments will show that this is not the case as the land includes a large number unsightly long since dead apple and plum trees, which surprisingly are covered by a preservation order.

On a personal level I was born in Bredon and have lived in the village my entire life. My son and daughter both went to Play School in the village and attended Bredon Hancocks School. My son represented the village at tennis, football and cricket. However when the time came they (like many of my friends children) had to move away from the village as they simply could not afford to buy a house here. The lack of affordable housing then, which is still in evidence today, needs to be addressed for future generations. I would like to see exact figures on how many of the over 100 houses delivered through recently built or approved schemes were allocated to affordable housing. I would also like to be reassured that any future developments should include the proposed target of 40% affordable housing which should be prioritised for people with a local connection.

The aim of this communication is simply to highlight that if Wychavon Council is called upon in future by Central Government to find addition housing to meet increased demand, a ready made plan of 33 houses, including 13 identified as affordable (of which, according to our planning appeal reference APP/H1840/A/14/2217607 the Council is already painfully short) could be resurrected at very short notice. Adoption of this Bredon plan would make this far more difficult for the council to do this. That said I note that Neighbourhood Plans are simply guidance documents so even if adopted I trust the Council, while listening to the views of the local people, would always make decisions passed on the good of the district as a whole.

Yours sincerely  
Mrs Veronica Bridge

**From:** [REDACTED]  
**Sent:** 21 April 2016 14:11  
**To:** [bredonpc@btconnect.com](mailto:bredonpc@btconnect.com)  
**Subject:** BREDON PARISH NEIGHBOURHOOD PLAN

Dear Sir/Madam, As owner of the land in Westmancote on the Kemerton Road between "Lynfield" and "Greenacres" I would like to comment as follows.

It seems very strange to me that it is proposed to designate my road frontage as a Local Green Space and also a Local Gap when "Greenacres" property

is already in existence in the "Local Gap"

The parish of Bredon is shown on your map as extending to a property almost at Kemerton. On the opposite side of the Kemerton Road are 7 properties in the parish

of Kemerton and they extend to "almost" opposite "Greenacres"

I would propose that the Green Space and Local Gap be the Kemerton side of "Greenacres" as this is in open country with views of Bredon Hill and the nearer landscape.

and indeed is a natural Gap and Green Space between Westmancote and Kemerton.


Would appreciate your comments

Regards

Edward Cook [REDACTED]

Edward Cook





28/3/16

Bredon and Bredon's Norton Parish Council  
Bredon Village Hall  
Main Road  
Bredon  
Tewkesbury  
Glos  
GL20 7QN

Dear Mrs Palmer and Parish Councillors,

**Re Bredon Parish Draft Neighbourhood Plan regarding Local Green Space Policy of 2.86 ( ha) of field number GR1 (Policy Map B)**

We received an impersonal letter dated 6/3/16 on 10/3/16 to Dear Sir or Madam that was addressed to William Cook and Jacqueline Shaw (we have been married nearly 14 years) referring us to a website and asking for our comments as Land Owners on the Neighbourhood Plan. We e-mailed Bredon Parish Council via Jackie Shields Bredon Parish Clerk on 12/3/16 and asked if one or two councillors could meet us to explain what this was and to discuss the implications for us. We had a disappointing e-mail reply saying that ' it was not possible as councillors do not have much spare time and there are nearly 3,000people in the Parish!' We were advised in the e-mail to attend a meeting at Bredon Village Hall on the 20<sup>th</sup>. This meeting was not mentioned in our letter of the 6/3/16. We contacted Mr and Mrs Meadows the other landowners of the field in Bredon's Norton and they had not heard about the Draft Neighbourhood Plan or received a letter. We went onto the website and were shocked that our land had been put forward as proposed Local Green Space without our knowledge.

We attended the public meeting at Bredon Parish hall on 20/3/16 and afterwards asked various questions. Unfortunately Matthew Darby a Parish Councillor walked away from Mr Cook whilst he was asking him a question about Local Green Space resulting from unnecessary physical behaviour from Mr Cook, which he apologises for. Mrs Palmer offered a meeting with councillors but after the heated discussion it was decided that it would be better to send the Parish Council a letter with our questions. We were also advised to contact Richard Coghlan a Parish Councillor from Bredon's Norton. We e-mailed him on 24/3/16 asking him when and by whom the field was nominated as Local Green Space. He e-mailed his reply on 25/3/16 and said he did not know who had suggested the land as the plan was in an advanced stage when he joined the Parish Council and would try and find out. He kindly visited Jackie later that day .

On the 21<sup>st</sup> March the day after the Village Hall meeting we received a phone call from Julie Ashfield a member of Bredon's Norton Social Committee to discuss the Queens 90<sup>th</sup> Birthday Celebrations. She was not aware that the field had been put forward as Local Green Space. Villagers have had access from the village hall to the field from our garden in the past and with the help of the Social Committee we were going to erect a gate through our garden but in view of this situation we told her we are not happy to allow the gate to be installed.

After nearly 14 years of using the field for village events e.g. cricket matches, barbecues, car parking for the church, we wonder whether we can hold such events again due to the way this matter has been handled. It is a shame that councillors had not held a meeting for the landowners (approx 100 according to Mr Darby) or for all the landowners in the area and asked who wished their land to be put forward. If only someone had spoken to us or made a phone call and been *neighbourly* when proposing our field for a Local Green Space in the *The Draft Neighbourhood Plan*.

Following the Draft Neighbourhood Plan Meeting held at Bredon Village Hall on 20/3/16 we would like the following confirmed in writing as agreed with Mrs Palmer. If the land is designated a 'Local Green Space' in the future we would like reassurance that

- 1) The field will never be under any restrictions to us the landowners. We would be able to farm it as we choose e.g. arable, livestock, erecting farm building/s without interference.
- 2) The field will never be listed as an 'Asset of Community Value' or have 'Village Green Status' and not be bought by the Council by Compulsory Purchase.

We would also like the following questions answered please if the land is stamped Local Green Space.

- a) If we want to sell the field or parts of the field do we have to notify the Council?
- b) With the devaluation of the land what compensation is being given to the landowners?
- c) What happens if landowners object to these proposals?
- d) Why is there a need for the field to be a 'Local Green Space' when it is already protected in an Area of Outstanding Natural Beauty and a Conservation Area?
- e) When and by whom was the land nominated as 'Local Green Space'?

Please could we have hard copies of the minutes of these details from the Council Meetings?

We trust we will receive answers to our questions shortly so we are able to comment on the proposals before the public consultation deadline of 17/4/16. As your letter was posted on 9/3/16 and arrived on 10/3/16 it gives us 5 weeks 3 days to comment when according to the plan we should have 6 weeks to reply. We are a bit confused as in the last paragraph of your letter it says we can make comments until 21/4/16, which would allow us 6 weeks.

We hope we do not need to take legal action.

Thank you.

Yours Faithfully



William and Jackie Cook

Cc Bredon's Norton Social Committee, Bredon's Norton Village Hall Committee, Val Wood Chairman Wychavon District Council, Harriet Baldwin MP.



14/4/16

Bredon and Bredon's Norton Parish Council  
Bredon Village Hall  
Bredon  
Tewkesbury  
Gloucestershire  
GL207QN

Dear Mrs Palmer and Parish Councillors,  
**Re Bredon Parish Draft Neighbourhood Plan regarding Local Green Space  
Policy of 2.86 (ha) of field number GR1 (policy Map B)**

With reference to our letter dated 28/3/16 sent to the Parish Council, which was received by Jackie Shields the Parish Clerk on 31/3/16. We are disappointed that after two weeks we are still waiting for a reply to our questions about Local Green Space and implications for us as land owners. This means we have no time to respond to your answers and seek legal advice if we need to by the end of the public consultation period deadline of 17/4/16.

According to The National Planning Policy Framework Guidance the qualifying body 'should contact land owners at an early stage about proposals to designate any part of their land as Local Green Space'. Wychavon Council have produced a protocol of good practice, which sets out how Neighbourhood Development Plans are to be taken forward, which should involve land owners from Stage 1 and 'throughout the process'.

As a statutory requirement of the National Planning Policy, failure to consult on issues within Neighbourhood Plans, Parish Councils run the risk of being unable to proceed with the Plans. In view of this The Bredon Parish Draft Neighbourhood Plan should be rewritten with correct procedures followed to ensure the process is transparent to all. Would it not be better practice for any land owner not to be involved in the process as it may lead to conflict of interest.

**We oppose The Bredon Parish Draft Neighbourhood Plan regarding Local Green Space**

Yours Faithfully



William and Jackie Cook

Cc Bredon's Norton Social Committee, Bredon's Norton Village Hall Committee, Val Wood Chairman Wychavon District Council, Harriet Baldwin MP

Mrs Jacqueline Shields  
Bredon Village Hall  
Main Road  
Bredon  
Tewkesbury  
GL20 7QN

Carter Jonas  
Mayfield House  
256 Banbury Road  
Oxford  
OX2 7DE

T: 01865 511444  
F: 01865 404433

Your ref:  
Our ref: IMG/csw/1012911

15<sup>th</sup> April 2016

## BY E-MAIL ONLY

Dear Mrs Shields

### BREDON PARISH SECOND DRAFT NEIGHBOURHOOD PLAN CONSULTATION, APRIL 2016

Carter Jonas LLP act on behalf of the owners of land on the edge of Tewkesbury, the Croome Estate Trustees (the Trustees) and Mactaggart & Mickel who have a promotion agreement with the Trustees for the delivery of development on part of the land proposed for identification as a Local Gap ('GAP5').

The land being promoted by Mactaggart and Mickel (known as 'land at Mitton') is on the eastern side of Bredon Road, in Wychavon District, but immediately abuts the built-up edge of Tewkesbury. The land extends to approximately 27 ha and is identified on the attached Site Location Plan.

The area adjoins a modern housing estate (Mitton) on its south western flank, whilst to the south and east is the extensive modern Tewkesbury Industrial Estate. The southern and eastern boundaries are defined by Carrant Brook towards which the land slopes down from Bredon Road.

**This representation raises a number of concerns with the draft Neighbourhood Plan and objects in the strongest possible terms to the inclusion of the Croome Estate Trustees land within GAP5 (as currently identified on Policies Map A of the Pre-Submission draft Bredon Parish Neighbourhood Plan). Indeed, we do not support GAP5 as a matter of principle, as it is currently premature, and more generally conflicts with the SWDP, and the clear national and local mandate to deliver a step change in housing delivery in sustainable locations.**

### Representation

The Pre-Submission draft Neighbourhood Plan confirms the 'basic conditions' that must be adhered to - including the need for a Neighbourhood Plan to promote the principles of sustainable development and be consistent with the strategic policies of the Local Plan.

### Planning Policy

The 'Planning Policy Context' section in the Pre-Submission draft Neighbourhood Plan goes on to provide an overview of the wider policy context, but there are some important errors and omissions.

Page 389 of the adopted South Worcestershire Development Plan (SWDP) and subsequent table confirm that many of the policies and proposals, together with supporting paragraphs, in the adopted Wychavon District Local Plan 2006, will be replaced upon adoption of the SWDP. Indeed, all of the Wychavon District Local Plan policies listed in the draft Neighbourhood Plan as being of specific relevance have now been replaced by the SWDP policies, with the exception of saved Policy ECON16: Food and Drink Retail.

Similarly, the Local Plan Policies Map has now been updated, and the referenced Proposal Map extracts, dating from 2006, need updating.

It is the commentary on the SWDP that gives greatest cause for concern. As the Parish Council will be aware, Policy SWDP 2: Development Strategy and Settlement Hierarchy, states:

- I. *"As required by the Duty to Co-Operate<sup>(5)</sup>, due consideration will be given, including through a review of the SWDP where appropriate, to the housing needs of other local planning authorities<sup>(6)</sup> in circumstances when it has been clearly established through the local plan process that those needs must be met through provision in the SWDP area."*

Footnote 6 makes specific reference to land at Mitton, stating:

*"Cheltenham Borough, Gloucester City and Tewkesbury Borough Councils are preparing a Joint Core Strategy (JCS). Land at Mitton (Wychavon District) and the Mythe (Malvern Hills District) were not included as strategic allocations in the Submission Version of the JCS (November 2014). The South Worcestershire Councils will, however, continue to monitor progress on the examination of the JCS."*

The Cheltenham, Gloucester and Tewkesbury Joint Core Strategy (CGTJCS) Examination process is ongoing, with the presiding Inspector having recently expressed concern about the planned scale and rate of delivery of new housing in the area. The Inspector held a specific hearing session on the land at Mitton, with evidence submitted by the participants to demonstrate that the subject land was both suitable and available for development, to assist in meeting the housing needs of both Tewkesbury Borough and Wychavon District. The land is clearly in a highly sustainable location for development, with excellent access to the facilities, services and employment opportunities available within Tewkesbury Town.

We would also draw to the attention of the Parish Council the section of the South Worcestershire Development Plan that deals with implementation (Policy SWDP62). Page 272 states:

*"3. The implementation of the plan [SWDP] will be monitored annually to ensure the strategy and objectives are being delivered. If at any time it is clear that the plan is significantly failing to deliver its objectives and key policies / proposals a partial or whole Plan review will be commenced. On the basis of the current available evidence, it is envisaged that a partial Plan review may need to commence by the end of 2019 if the SWC are to ensure there is an up-to-date Plan for the area throughout the 2020's and beyond. It will be an option however for the SWC to consider taking actions other than a partial or full plan review (such as the bringing forward of sustainable alternative / additional sites through the development management process) if a more rapid response is demanded / appropriate."*

*4. The SWC consider that any one of the following circumstances would require a review of the plan to commence or sustainable alternative / additional sites to be brought forward, as appropriate:*

- a. *A failure of policies SWDP 2, 3, 4, 5 and 7 when assessed against the plan objectives set out at Annex B to the Plan and in particular a failure to deliver the amount of development required by policy SWDP 3.*
- b. *Evidence established through another authority's Local Plan process that its unmet strategic requirements can only be accommodated within South Worcestershire.*
- c. *Changes in national planning policy and guidance or new planning evidence that mean one or more of the Plan's policies is not up to date.*

- d. *Evidence in the Authorities' Monitoring Report that one or more Plan policies are not achieving the Plan's objectives or are working contrary to the effective planning of the South Worcestershire area."*

Circumstance a. or b. could result in the need for the land at Mitton to come forward for development. It is clear from the work undertaken for the SWDP and Joint Core Strategy that the land at Mitton has considerable merit as a sustainable development location, which may well be needed to meet the future housing needs of Wychavon District and / or Tewkesbury Borough.

In the context of all of the above, we would contend that any Neighbourhood Plan policies that seek to restrict the opportunity for development on the land at Mitton would certainly be premature at this time. Further, as set out in more detail below, we believe that the draft Local Gap Policy (NP2, GAP5) fails as a matter of principle the basic conditions test, by not promoting the principles of sustainable development and by being in conflict with the strategic policies of the Local Plan (in particular, Policy SWDP 2).

#### *Spatial Plan for the Parish (draft Policy NP1)*

Policy NP1 of the draft Neighbourhood Plan seeks to strictly control development beyond the defined settlement boundaries. We generally accept this proposed approach, but contend that the Policy and supporting text must differentiate between open, isolated countryside and the land at Mitton that immediately abuts the built up area of Tewkesbury Town, a sustainable settlement with a range of facilities, services and employment opportunities.

Policy NP1 should make reference to the provisions set out in the SWDP, which do provide for the land at Mitton to come forward for development in a defined set of circumstances (see above).

#### *Local Gaps and Key Views (draft Policy NP2)*

We have no objection to the principle of a policy that seeks to prevent settlement coalescence or indeed to a policy that seeks to safeguard land that is important to the setting of a village. Our concern is simply that the Croome Estate Trustees land, falling partly within GAP5, cannot be said to effectively fulfil either function.

In terms of the issue of settlement coalescence, the southern edge of the Trustees land is over 1.5km from the edge of Bredon's Hardwick. At its nearest point, the Trustees land is 1.2km from Bredon's Hardwick. This is a significant distance, with intervening hedgerows and topography meaning that even with development on the Trustees land, there would remain a clear physical and visual separation between the edge of Tewkesbury and the settlement of Bredon's Hardwick. Also relevant is that the northern edge of the Tewkesbury Industrial Estate and Northway residential area are within 1km and 1.1km (respectively) of Bredon's Hardwick.

We believe there are simply no grounds for suggesting that the Croome Estate Trustees land needs to be the subject of a gap policy to prevent settlement coalescence between Tewkesbury Town and Bredon's Hardwick.

In terms of the contribution that the Croome Estate Trustees land makes to the setting of Bredon's Hardwick, again, distance is an important consideration. Paragraph 6.9 of the Neighbourhood Plan suggests that each of the proposed Local Gaps makes "...a significant contribution to maintaining the individual character of the adjoining settlements". We would contend that much of GAP5 cannot be said to adjoin Bredon's Hardwick or contribute directly to its individual character. As shown on the Viewshed Plan attached any residential development at 8m in height on the Croome Estate Trustees land would be difficult to view from Bredon's Hardwick, certainly once any landscaping scheme was established. Consequently, we would affirm that any development on the Trustees land would have no material adverse, direct, impact on the character of Bredon's Hardwick.

Due to local topography, and with appropriate landscaping, much of the green corridor along the B4080 could be maintained following development on land at Mitton.



We are concerned that the Neighbourhood Plan is seeking to shoe-horn more general concerns about landscape impact and protection of the countryside into a Local Gap policy. Development on the Trustees land would inevitably have some impact on the character of the immediate area, but such matters would be fully addressed at the planning application stage, taking into account the landscape character and policies in the Development Plan.

The Parish Council has sought to evidence Policy NP2 through a brief document entitled 'Assessment of Local Gaps in Bredon Parish'. Paragraph 1.2 of the Assessment briefly addresses SWDP Policy 2, which deals with Significant Gaps. The Assessment notes that the SWDP identified buffers (where felt necessary) to separate smaller rural settlements from urban areas. Contrary to the wording of the Assessment, the SWDP wording does not report restricting consideration to only those urban areas within the plan area. If deemed appropriate and necessary, the Councils (or indeed the SWDP Inspector) could have sought to introduce a Significant Gap between Tewkesbury and Bredon's Hardwick.

The decision not to do so is telling, and of course ties in with the provisions made in the SWDP for potential housing development on the land at Mitton.

The Assessment suggests that the Neighbourhood Plan seeks to apply the same principles as the SWDP, but between rural settlements. Tewkesbury is not a rural settlement.

Paragraph 2.3 of the Assessment refers to the need for the ambition of the Neighbourhood Plan to be aligned with the strategic needs and priorities of the wider local area. Neighbourhood Plans should not undermine the strategic policies of the Local Plan. These references are of direct relevance to the District and Borough Council's need to meet objectively assessed housing need, and the identified role that the land at Mitton could play in meeting some of this housing need.

We believe that proposed GAP5 undermines Policy SWDP 2.

Turning to the criteria used to identify the Local Gaps.

- Test 1 – For the reasons set out above, the land at Mitton should be excluded from further consideration, as the SWDP makes specific reference to the potential role of this land in meeting future development needs.
- Test 2 – There is an extensive area of undeveloped land between Tewkesbury and Bredon's Hardwick, which may well be why the SWDP did not determine that the land needed to be protected as a Significant Gap. There is no justification for the indicative distance threshold and indeed at its widest point, the gap between Tewkesbury and Bredon's Hardwick is 50% longer than the indicative threshold.
- Test 3 – There is no 'significant danger' of Tewkesbury and Bredon's Hardwick coalescing, and it is certainly the case that any development on the Croome Estate Trustee's land would not result in settlement coalescence. We have already identified an anomaly, in terms of the suggestion that the Neighbourhood Plan is concerned with the relationship between rural settlements, and yet consideration is being given to the relationship between Bredon's Hardwick and Tewkesbury. The range of other factors identified for consideration are not wholly unreasonable, it is how they are applied that is of concern. For example, an attractive approach to a village might involve seeking to protect some immediate fields, but seeking to prevent development along a 1.5km corridor, on the basis that this all forms part of the setting of Bredon's Hardwick is not a sustainable position and cannot be justified.
- Test 4 – The first bullet under Test 4 states that for land to be designated as a Local Gap, it should be deemed that new development would exacerbate settlement coalescence, or would harm the character of the settlement. As previously stated, it is very difficult to see how development on the Croome Estate Trustees land would materially impact on these factors, and therefore it is very difficult to understand the justification being suggested by the Parish Council for identification of the subject land as part of a Local Gap.

In summary, we object in the strongest possible terms to the inclusion of the Croome Estate Trustees land within GAP5 as part of Policy NP2. Indeed, we do not support GAP5 as a matter of principle, as is currently premature, and more generally conflicts with the SWDP, and the clear national and local mandate to deliver a step change in housing delivery in sustainable locations.

*Local Green Space (draft Policy NP13)*

We have no objection to the Mitton Allotments being identified as an area of Local Green Space.

### **Summary and Conclusion**

This representation is made on behalf of the Croome Estate Trustees (the Trustees) and Mactaggart & Mickel. The land being promoted by Mactaggart and Mickel (known as 'land at Mitton') is on the eastern side of Bredon Road and immediately abuts the built-up edge of Tewkesbury, a large, sustainable, urban area.

The subject land adjoins the modern Mitton housing estate on its south western flank, whilst to the south and east is the extensive modern Tewkesbury Industrial Estate. The land is generally recognised as being capable of delivering a sustainable urban extension to Tewkesbury, with administrative boundaries having been the principle reason for the land not coming forward sooner.

This representation raises a number of concerns with the draft Neighbourhood Plan content and approach, and raises strong objection to the proposed inclusion of the Croome Estate Trustees land within GAP5. In particular:

- There are important errors and omissions in the 'Planning Policy Context' section of the Pre-Submission draft Neighbourhood Plan. All but one of the referenced Local Plan policies have been superseded, and more importantly, the Neighbourhood Plan needs to reference and take full account of all of the SWDP policies that directly relate to the Neighbourhood Plan area – in particular policies SWDP2 and SWDP62.
- The Neighbourhood Plan must not seek to introduce policies that would undermine the SWDP, in terms of the potential for future development on the land at Mitton. We very much doubt such an approach would pass examination, and the risk of legal challenge would be high.
- We would contend that any Neighbourhood Plan policies that seek to restrict the opportunity for development on the land at Mitton would certainly be premature at this time. Further, we believe that the Local Gap Policy (NP2, GAP5) fails as a matter of principle the basic conditions test, by not promoting the principles of sustainable development and by being in conflict with the strategic policies of the Local Plan (in particular, Policy SWDP2).
- Draft Policy NP1 of the draft Neighbourhood Plan seeks to strictly control development beyond the defined settlement boundaries. We generally accept this proposed approach, but contend that the Policy and supporting text must differentiate between open, isolated countryside and the land at Mitton that immediately abuts the built up area of Tewkesbury Town, a sustainable settlement with a range of facilities, services and employment opportunities.
- Our detailed comments on Draft Policy NP2 must be read in the context of more general concerns and objection to any policy or approach in the Neighbourhood Plan that seeks to restrict the potential for land at Mitton to come forward for development. We believe that the Croome Estate Trustees land, falling partly within GAP5, cannot be said to effectively fulfil any of the stated functions of Local Gap land. It is not part of a gap separating rural settlements; its development would not lead to the coalescence of Tewkesbury and Bredon's Hardwick; and the subject land is so visually detached from Bredon's Hardwick itself, it cannot be said to adjoin the settlement, or directly contribute to the character of the settlement.



- We are concerned that the Neighbourhood Plan is seeking to shoe-horn more general concerns about landscape impact and protection of the countryside into a Local Gap policy. Development on the Trustees land would inevitably have some impact on the character of the immediate area, but such matters would be fully addressed at the planning application stage, taking into account the landscape character and policies in the Development Plan.

**In conclusion, we object in the strongest possible terms to the inclusion of the Croome Estate Trustees land within GAP5 as part of Policy NP2. Indeed, we do not support GAP5 as a matter of principle, as it is currently premature, and more generally conflicts with the SWDP, and the clear national and local mandate to deliver a step change in housing delivery in sustainable locations.**

Please do let us know if you require any further information or clarification.

We would like to be kept informed of all future stages of the Neighbourhood Plan process.

Yours sincerely



**Ian Gillespie MRTPI**  
**Partner**

For and on behalf of Carter Jonas LLP

Email: [ian.gillespie@carterjonas.co.uk](mailto:ian.gillespie@carterjonas.co.uk)

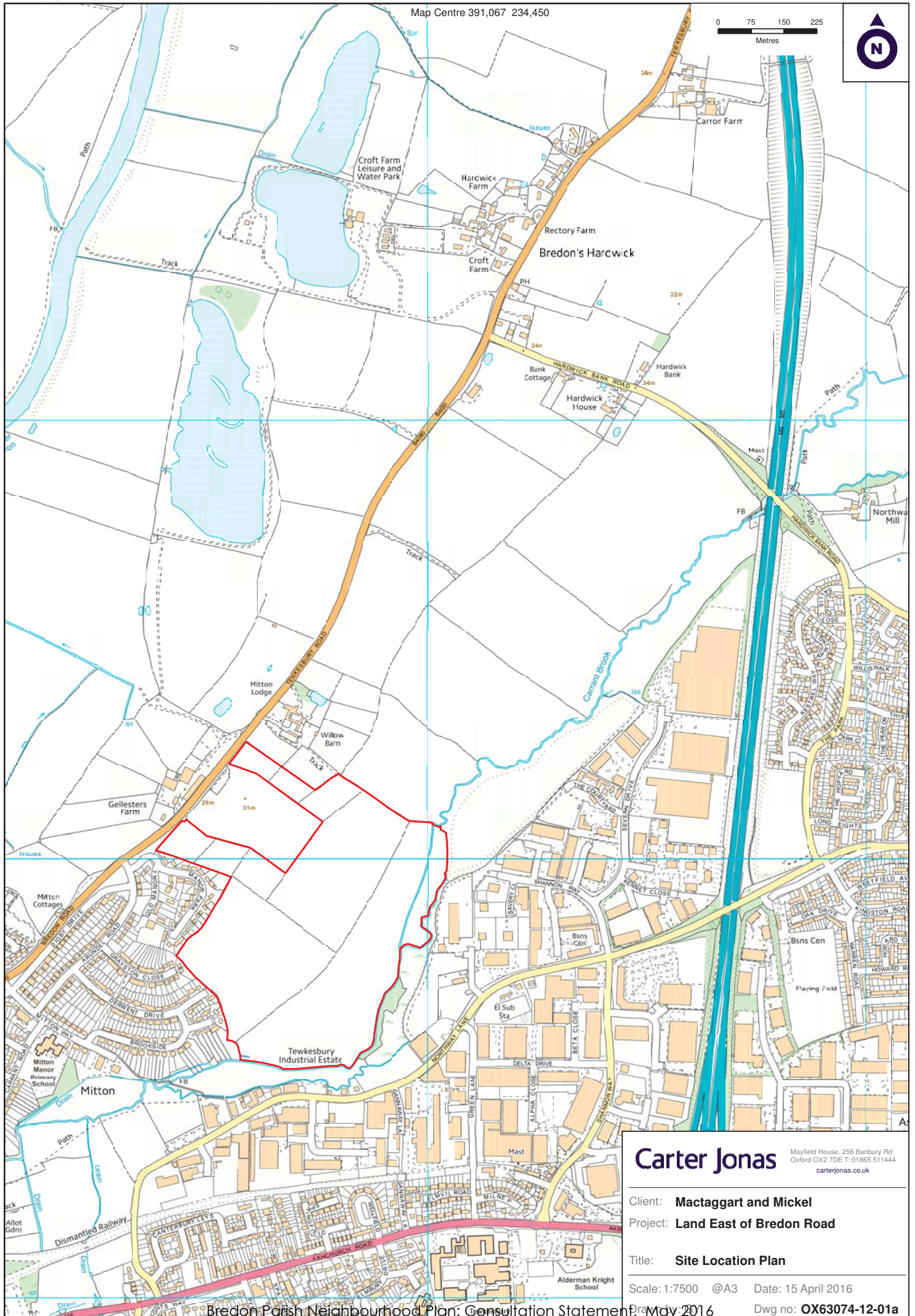
DD: 01865 404442

Enc Site Location Plan

Viewshed Plan

Map Centre 391,067 234,450

0 75 150 225  
Metres



**Carter Jonas**

Mayfield House, 256 Banbury Rd  
Oxford OX2 7DE T: 01865 511444  
carterjonas.co.uk

Client: **Mactaggart and Mickel**

Project: **Land East of Bredon Road**

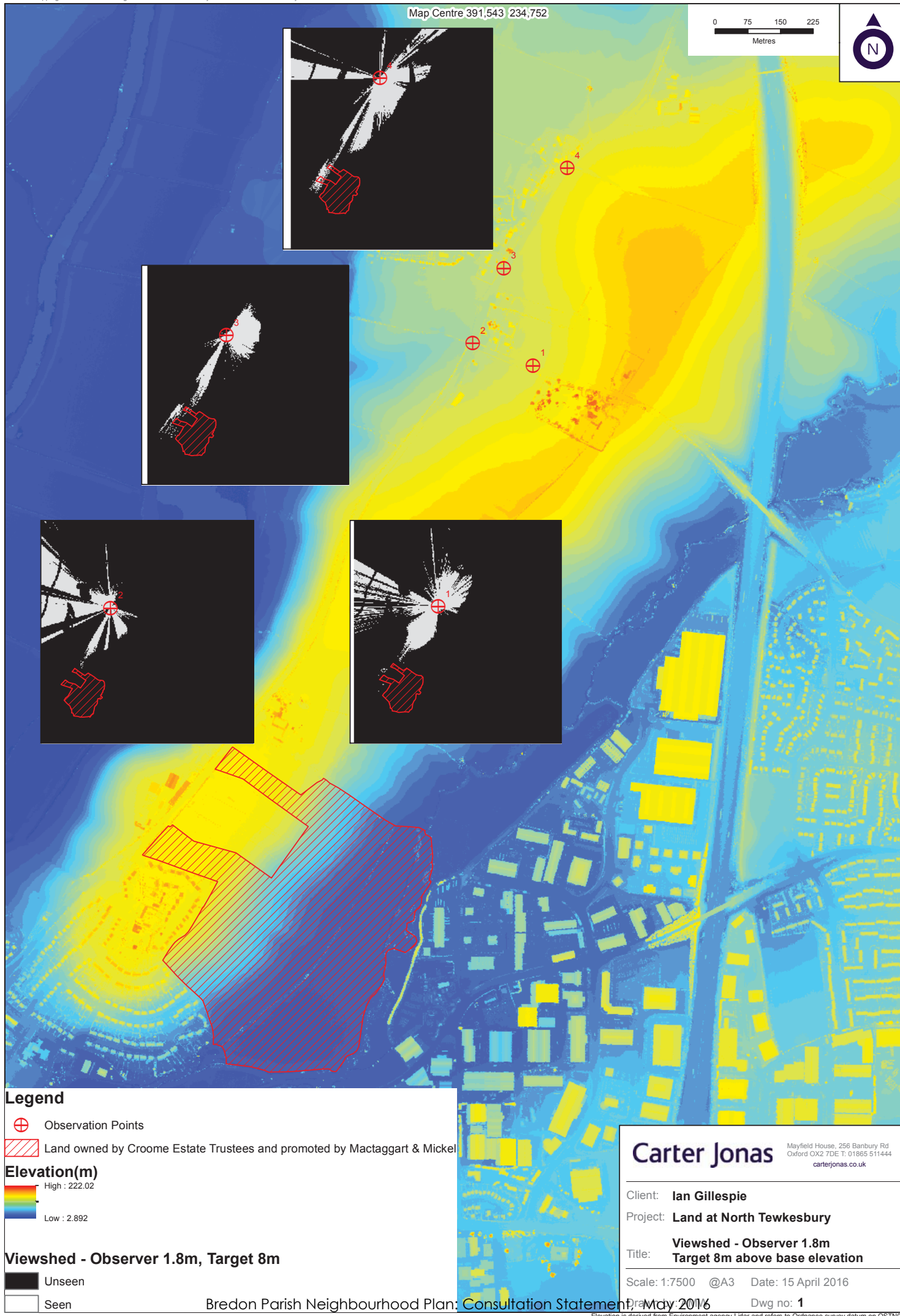
Title: **Site Location Plan**

Scale: 1:7500 @A3 Date: 15 April 2016

Dwg no: **OX63074-12-01a**

Bredon Parish Neighbourhood Plan: Consultation Statement, May 2016





With reference to foreword to neighbourhood plan 2016-2030 2nd paragraph, (quote) development means change, this should mean change for the better, it should also mean providing homes for people to live, (unquote) These homes can only be for the richer people, average house prices in Bredon 2015 was £240,000.

No young people can afford housing because no social or shared housing is available.

The reason for this is the Parish / Wychever Councils not allowing any small scale developments such as Benshams which would have (in many peoples opinion) enhanced the area and provided much needed social houses for younger people of the parish "Your Future Generation"

Paragraph 3. (quote) During the lifetime of the plan housing allocations and windfalls are expected to provide around 125 new homes for the benefits of local people and above all seeks to raise the standard of built designs (unquote)

Your allocations for this period are all windfalls with no provision for social / shared housing for the younger people, Your Future Generation.

As for raising the standard of built design, what an example reference the old telephone exchange in Oak Lane Bredon Planning Application 2014 How was this allowed to be built, and not to original plans? What an eyesore to those people living in that vicinity?

Featured on the front page of the Eves Echo / Citizen Homebuyer 17/03/16  
Not a very good advert for Bredon!!

### Built Environment Ref. 2.15

(QUOTE) During the second half of the 20th Century Bredon Village experienced major expansion (UNQUOTE)  
The area mentioned in Ref 2.15 relates to Blenheim Drive and latterly Orchard Close. This area has 329 dwellings in total and equates to 41% of the total dwellings in Bredon as per your analysis APP 2, household numbers in Bredon Parish 2007-2030. All of these houses were built on orchards, horticultural land and allotments, and to older generations of "Bredonians" like us was known as the "Gravel Pits"

Would the current residents of these houses have a thought about where they are living today? We think not!

But when it comes to Public Consultation APP 5 These same people voted against what their principles should have been.

Ref APP 5 Public Consultation 2015 Item 2 we noted the ages category responses that 44% of people were retirement age and over, and we suggest that this figure could be much higher. Bredon is fastly becoming a retirement haven, What is next, a retirement complex, now theres a thought?

During the period of this plan 2016-2030 the school in Bredon will decline in numbers due to lack of housing for the younger people.

Your Future Generation.

SUBMITTED BY MRS JA AND MR S.H. DONNELLY LANDOWNERS AT BENSHAM. PROPOSED LG57 AND CAP 3.



Reference LGS 7 And Cap 3

Regarding proposed LGS 7 and Cap 3 Reference Bensham Allotments, to part of 1E 3.1 Acres on Northside of the track, We strongly object to this proposal. Ours is private land and not for public use iE LGS or Local Caps!! In our opinion all landowners should have been notified about these proposals in the first stages not 12 Months later.

Most of the landowners are aged 75 and older and have nobody in family that wants to work the ground. As at 05/04/16 only 1 plot is being used as an allotment, rented out to 4 persons. This equates to only 8.41% of the 3.1 acre site, and taking the whole 21.5 Acres of Bensham into account only 1.2% is being used as allotments. All these plots of land are privately owned and most have been in the same families for a 100 Years or more!

Surely we should all be able to decide what we would like to do with our own land (within reason) and not be dictated by National and Local Authorities.

SUBMITTED BY MRS JA AND MR SH DONNELLY LANDOWNERS AT BENSHAM. PROPOSED LGS 7 AND CAP 3.

Benshams Private Allotments Approx 21.5 Acres.  
Reference Proposed LGS7. Part History of Benshams.

With reference to land on the south side of the track Bensham House as it is now named was built under agricultural purposes with approx 11 acres of land in 3 plots by Mr Sidney Merrell, a local man with his wife and 2 children. He worked all 3 plots with his trusty Ferguson Tractor growing all root crops and brassica. He worked very hard to make a moderate living. On his retirement due to ill health he sold the house and land to Mrs. Priest (local factory owner.) 1960's. The land was turned into grassed areas where horses were kept, some of their own and some livery. Since that time this land has never been used for its original purpose i.e. Allotment land for growing vegetables

With reference to land on the north side, far West End.

Mr Darby planted trees many years ago blocking out such wonderful views of the Malvern Hills and the lovely spire of St Giles Church, as mentioned some many times in your reports regarding views. Reference Key Views APP 3 Quote Views into "Bensham Allotments" u.g. This should be saying Views Along Bensham, but for those trees, named "Bensham Wood" about 2 Years ago.

SUBMITTED BY MRS JA AND MR S.H. DONNELLY LANDOWNERS AT  
BENSHAM. PROPOSED LGS7 AND GAP 3



Friday, 18 March 2016

(Copy sent to Wychavon District Council)

Dear Ms Shields

In response to your letter concerning the proposed "Bredon Parish Neighbourhood Plan" please view my comments set out below.

It is hoped that no one on the BPC or Wychavon council have a vested interest in the outcome of these proposals, if they have then this interest should be declared and anyone having a vested interest whether it be direct or indirect should step away from the process.

With reference to the document headed: **ASSESSMENT OF LOCAL GAPS IN BREDON PARISH**

1.2 These designated areas of Local Gaps are only supposed to apply "(point 8) makes clear that this designation is only intended to apply to buffers separating smaller rural settlements from urban areas **within the plan area.**

Where are these urban areas that Bredon needs a "Local Gap" for protection from?

The **Local Gaps 4 & 5** the Tewkesbury entrance to the village of Bredon, **Local Gaps 1 & 2** the Kemerton entrance to Bredon & **Local Gap 3** the Cheltenham entrance to Bredon in effect "Ring Fence" Bredon with a "Blanket" of Local Gaps.

2.7 SWDP Annex D (Settlement Hierarchy) identifies Bredon as a **Category 1 Village.**

Category 1 Villages are in rural areas and new development will **predominately** be aimed at meeting locally identified housing and employment needs.

It is noted that Bredon is a Category 1 Village in which there is a definite need for industry to sustain local jobs and the associated housing that new industry would demand. The proposed Robert Hitchens, £30m retail development at Ashchurch will provide 1000 new jobs for the local economy and is within easy reach from Bredon especially the Cheltenham road end of the village. Where will these new workers live within the catchment area of Ashchurch?

2.9 Policy SWDP 59 (New Housing for Villages) allocates land for 24 homes off Oak Lane, Bredon – predominately aimed at meeting locally identified housing need.

Although this area at the end of Oak Lane has outline planning permission it would appear that no developer has come forward to take the site on. Is it being used as Land Bank or is it that the access is just too narrow?

2.10 Policy SWDP 2 D requires that development proposals should ensure the retention of the open character of the Significant Gaps. 'Significant Gap' is defined in the SWDP Glossary as a local planning designation intended to protect the settings and separate identities of settlements by:

- helping to avoid coalescence;
- retaining the existing settlement pattern through maintaining the openness of the land; and



- securing the quality of life benefits of having open land close to where people live.

The distance between the last house in Kinsham & the first house in Bredon, "Cleeve View", is approximately 750 metres however on the Cheltenham side of Bensham allotments are two other properties, a dwelling house called "The Benshams" owned by Mr Priest and True Blue Farm. That being the case the area of Bensham allotments should be considered as "IN FILL" and as such would have no bearing on the so called coalescence. The buffer zone of the substantial field in between the farm buildings and Kinsham would still exist as it is now.

### **Test 2. Is there an extensive area of undeveloped land between the settlements where the Local Gap is proposed?**

- Local Gap designation will not be appropriate where an extensive area of undeveloped land separates settlements. Development in such locations (while it may have other negative impacts) would be unlikely to bring about settlement coalescence.
- Whilst there is no threshold proposed for a minimum distance between settlements, the Parish Council considers that where more than 1000 metres of uninterrupted open land exists on both sides of a road linking two villages, the risks of coalescence are small.
- Consideration should be given as to whether the open land extends across both sides of the road, and the degree to which it has been fragmented by occasional dwellings, farm buildings and other development.

I draw your attention to the 1<sup>st</sup> paragraph and my response in 2.10.

In paragraph 2 there already is only 450 metres between the True Blue farm buildings and the last house in Kinsham and it has been that way for many years.

In paragraph 3 Bensham allotments stand only on the west side of Cheltenham road.

### **Test 3. Does the area play a significant role in preventing coalescence between settlements, or does it enhance the individual character of a settlement?**

- An area could qualify for designation if it played a significant role in separating two settlements that would otherwise be in danger of coalescing.
- Consideration should be given to the fact that large settlements exert a greater 'gravitational' effect on their hinterlands than small ones, both physically and psychologically. They may require larger buffers to prevent a sense of coalescence, even where a physical gap remains.
- An area could also qualify for designation if it made a significant contribution to the character of a settlement, for example by enhancing its setting, or by providing an attractive rural backdrop for a key approach, or by providing important views into or out of the settlement or its environs.

See Test 2, paragraph 1 & 2 above.

The Bensham allotments currently have only one plot being worked by sub-tenants. As there is no available water on site (and there never has been) the likelihood of further plots being worked is unlikely. The idea that these allotments can be considered as **Traditional Orchards** is nonsense. When my father, Harold Drew, bought this one third of an acre in the mid 50's there were many old (50yrs old according to the previous owners) plum trees on his plot. As a young boy I marvelled at the Blue Tits and Great Tits that nested in the holes in the plum trees which were the result of rot setting into the places where old branches had dropped off. 60 years later it's no wonder that these 100 year + old trees have mostly died with just a few hanging on to their final curtain call.

The Tree Preservation Order (TPO) that was placed on a few of my and my neighbour's trees is farcical. Of the 9 or so trees that had the TPO only 2 remain visibly alive, just. Even the Walnut tree, which my father planted some 40yrs ago, which is renowned for its toxic effect on surrounding trees and bushes and also to local pets & wildlife, appears to have succumbed.

Other younger trees on Bensham allotments are seen to be showing signs of stress and are either dead or dying.

In paragraph 007: where is the “sufficient land in suitable locations to meet identified development needs” which amounts to 65 houses in Bredon?

In paragraph 015: LGS6/9/10 on the Tewkesbury road into Bredon, LGS3 on the Eckington road into Bredon, LGS2/4/5 on the Kemerton road into Bredon & LGS7/8 on the Cheltenham road into Bredon effectively “Ring-fencing” Bredon with a blanket of Local Green Space.

### Local Planning Policy

2.5 The South Worcestershire Development Plan (SWDP) was adopted on 25 February 2016. This is the ‘Local Plan’ which used to determine planning applications in the three local planning authority areas it covers – Wychavon District, Malvern Hills District, and Worcester City. It sets out the basic rules which new development must follow, as well as allocating certain areas of land for new housing or employment. Where is BPC allocating these “certain areas of land for new housing” which amount to 65 houses in Bredon?

2.7 SWDP Annex D (Settlement Hierarchy) identifies Bredon as a Category 1 Village. Category 1 Villages are in rural areas and new development will predominately be aimed at meeting locally identified housing and employment needs

It is noted that Bredon is a Category 1 Village in which there is a definite need for industry to sustain local jobs and the associated housing that new industry would demand. The proposed Robert Hitchins, £30m retail development at Ashchurch will provide 1000 new jobs for the local economy and is within easy reach from Bredon especially the Cheltenham road end of the village. Where will these new workers live within the catchment area of Ashchurch?

2.9 Policy SWDP 59 (New Housing for Villages) allocates land for 24 homes off Oak Lane, Bredon – predominately aimed at meeting locally identified housing need.

Although this area at the end of Oak Lane has outline planning permission it would appear that no developer has come forward to take the site on. Is it being used as Land Bank or is it that the access is just too narrow?

3.3 Particular weight has been given to areas of remaining traditional orchard and horticultural small-holding, which have strong cultural associations with Bredon Parish. This reflects the special importance and local significance attached to traditional orchards in National Character Area Profile 106 Severn & Avon Vales (Natural England, 2014), which emphasises the need to protect and restore surviving examples.

Below is a repeat of statement for Test 3 in the Local Gap assessment.

The Bensham allotments currently have only one plot being worked by sub-tenants. As there is no available water on site (and there never has been) the likelihood of further plots being worked is unlikely. The idea that these allotments can be considered as **Traditional Orchards** is nonsense. When my father, Harold Drew, bought this one third of an acre in the mid 50’s there were many old (50yrs old according to the previous owners) plum trees on his plot. As a young boy I marvelled at the Blue Tits and Great Tits that nested in the holes in the plum trees which were the result of rot setting into the places where old branches had dropped off. 60 years later it’s no wonder that these 100 year + old trees have mostly died with just a few hanging on to their final curtain call.

The Tree Preservation Order (TPO) that was placed on a few of my and my neighbour’s trees is farcical. Of the 9 or so trees that had the TPO only 2 remain visibly alive, just. Even the Walnut tree, which my father planted some 40yrs ago, which is renowned for its toxic effect on surrounding trees and bushes and also to local pets & wildlife, appears to have succumbed.

Other younger trees on Bensham allotments are seen to be showing signs of stress and are either dead or dying.

On a day last summer while working on the allotment cutting grass

On a day last summer while working on the allotment cutting grass a local couple beckoned me over to the road side to ask if I could point out the trees that had the TPO. They were at first astounded & then amused when I showed them the dead & dying trees. They told me that they thought the unused allotments would make a great place for a small development.

The allotments at Bensham are, in general, disused, untidy and cannot be considered as **recreational** land as there is no public right of way through them. The land owners own the track that runs through the allotments.

**Test 4. Would new development have a detrimental impact on the area's role as a buffer between settlements, or on the character of any particular settlement?**

- For land to be designated as a Local Gap, it should be deemed that new development, such as dwellings or business premises, would exacerbate settlement coalescence, or would harm to the character of a settlement.
- Where little open space remains between settlements, it may be taken as read that new development will exacerbate coalescence.
- Account should be taken of how even low levels of development can bring about large changes in the way an area is experienced in certain contexts. For example, a single dwelling located in open land between settlements, is likely to result in a much greater loss of rural character than one located immediately adjacent to a settlement.
- Account should be taken of the effects of developments associated with rural businesses such as large modern agricultural barns, holiday caravans and equine structures on settlement coalescence or loss of character..

In paragraph 1, 2, 3 & 4: I refer back to the answer in 2.10.

The summary of Test 4 mentions once again the 410 metres between settlements. This is the distance between the last settlement in Kinsham and the True Blue farm buildings before the Bredon sign; this would indicate that BPC considers the edge of the village to be the farm and not the house called "Cleeve View" thus supporting the case for Bensham allotments to be **"IN FILL"** potential.

With reference to the document headed: **ASSESSMENT OF LOCAL GREEN SPACE IN BREDON PARISH**

**2. Policy Background - National Planning Policy**

2.2 NPPF §77 makes it clear that the designation will not be appropriate for most green areas or open space and should only be used:

- Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- Where the green area concerned is local in character and is not an extensive tract of land.

In paragraph 1 above: I refer to the answer given in Test 3 of the ASSESSMENT OF LOCAL GAPS IN BREDON PARISH. In paragraph 2: What does the BPC consider to be an extensive tract of land?

**2.4 Additional guidance on Local Green Space designation is provided in Planning Practice Guidance (PPG) ID: 37 Paragraphs 005-022. Of particular relevance to the Bredon Parish Neighbourhood Plan are the following paragraphs.**

- §007 – Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs, and the Local Green Space designation should not be used in a way that undermines this aim of plan making [Reference ID: 37-00720140306].
- §015 – Blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name [Reference ID: 37-015-20140306].

The allotments at Bensham are, in general, disused, untidy and cannot be considered as recreational land as there is no public right of way through them. The land owners own the track that runs through the allotments.

### **Test 3. Is the site local in character and not an extensive tract of land?**

- The NPPF makes clear that the area to be designated should be local in character and not an extensive tract of land.
- PPG states that blanket designation of open countryside adjacent to settlements is not appropriate.
- Whilst there is no size threshold proposed for an area of Local Green Space, the Parish Council considers that any site of more than 10 hectares might reasonably be interpreted as 'extensive' or 'blanket'. BPC consider that an extensive tract of land is measured as an area of 10 hectares to suit the situation.

### **Test 4. Is the site demonstrably special to the local community?**

- The designation of Local Green Space must be based on evidence which demonstrates why the area is demonstrably special to the local community and holds a particular local significance. To pass this test, an area must be demonstrably special and locally significant in one of the following categories.

- **Beauty** – This relates to the visual attractiveness and aesthetic value of the site, and its contribution to the streetscape, landscape, character or setting of a settlement. To qualify, the site should contribute significantly to local character, for example by defining a sense of place, or by helping to define the physical form of a settlement.

I have already stated the poor condition of the allotments with dead or dying trees the once flourishing orchards beset with blossom in the spring are no more. There is only one plot being worked, the lack of water prevents traditional allotments from thriving successfully.

- **Recreational value** – Sites would need to hold local significance for recreation and be important to the community for a particular recreation activity or range of activities. These could be formal or informal activities.

As there is no public access to the allotment site, the land owners use their own private access; no recreational use is possible or desired.

- **Tranquillity** – In order to qualify, the site would need to be viewed by local people as important for the tranquillity it provided, offering a place for reflection and peaceful enjoyment.

For the same reason above, apart from the owners themselves, no one can claim the site to provide tranquillity.

- **Richness of wildlife** – A site would need to be locally significant for wildlife in a way that could be demonstrated. It might, for example, home to species or habitats of principal importance, veteran trees, or locally characteristic plants and animals such as mistletoe. Where the site is already protected by a designation (e.g. SSSI), consideration should be given as to whether any additional benefit would result from designation as Local Green Space.

Apart from the odd rabbit no one can claim that this site harbours any significant wild life and the "veteran" trees are mostly dead or dying. Because of this I cannot even find mistletoe anywhere on our allotments. There still might be the odd birds nest but no more than a nest box in a traditional house would support.

## **Bredon Parish Neighbourhood Plan 2016-2030**

Pre-Submission Draft

### **Foreword**

The purpose of this Neighbourhood Plan is to enable the people who best understand the special qualities of the parish – its residents – to steer future development. Development means change. This should mean

change for the better. It should also mean providing homes for people to live, unlocking economic prosperity, responding to new technologies, looking after the environment and historic buildings, as well as ensuring that people have good access to healthcare, education, transport and other essential services.

The "IN FILL", Bensham allotments, between the True Blue farm buildings & the house known as "Cleeve View" would be perfect to supply housing especially affordable housing for local people, young local people in particular who are leaving the village simply because of the lack of affordable housing within the village of Bredon.

During the lifetime of the plan, housing allocations and windfalls are expected to provide around 125 new homes across the parish. This plan aims to shape and direct that development positively so that it delivers the greatest benefits for local people. Above all, the plan seeks to raise the standard of built design in shared public spaces, so that the parish we leave behind for succeeding generations is even better than it is today.

65 of the 125 homes expected to be built in the Parish have been allocated to be built in Bredon village. This excludes the development in Oak Lane which has outline planning permission for 24 houses.

### **3. Planning Policy Context**

3.9 SWDP Annex D (Settlement Hierarchy) identifies Bredon as a Category 1 Village. Category 1 Villages are in rural areas and new development will predominately be aimed at meeting locally identified housing and employment needs.

Repeat of 2.7 LGS above: It is noted that Bredon is a Category 1 Village in which there is a definite need for industry to sustain local jobs and the associated housing that new industry would demand. The proposed Robert Hitchins, £30m retail development at Ashchurch will provide 1000 new jobs for the local economy and is within easy reach from Bredon especially the Cheltenham road end of the village. Where will these new workers live within the catchment area of Ashchurch?

3.11 Policy SWDP 59 (New Housing for Villages) allocates land for 24 homes off Oak Lane, Bredon – predominately aimed at meeting locally identified housing need.

Repeat of 2.9 LGS above: Although this area at the end of Oak Lane has outline planning permission it would appear that no developer has come forward to take the site on. Is it being used as Land Bank or is it that the access is just too narrow?

### **Minerals Local Plan for Worcestershire (emerging)**

3.14 Worcestershire County Council is preparing a new Minerals Local Plan, which sets out how mineral extraction will be planned for across the county. It will guide where minerals should be extracted, how sites should be restored when working has finished, and how people and places should be protected. Once adopted, it will replace the existing saved policies in the Hereford and Worcester Minerals Local Plan (1997) and will form part of the development plan for the area.

Please elaborate on this statement as my land sits within an area that almost certainly has deposits of sand & gravel. Could this be the reason that the LGS & LG does not extend along the whole of the Bensham site right down to the railway line. Are you planning to extract sand & gravel from this area? With all the noise, dust & heavy trucks that would bring, I doubt whether the residents of Bredon would look too kindly on that type of industry right on their doorstep.

### **Negative features of the parish**

4.9 The VDS consultations provided a benchmark for this section of the survey. Several of the features recorded as negative in 2011 were found to have deteriorated further by 2015. The top five negative features were found to be:

4.9 The VDS consultations provided a benchmark for this section of the survey. Several of the features recorded as negative in 2011 were found to have deteriorated further by 2015. The top five negative features were found to be:

❑ Loss of open countryside between settlements: 38% of respondents stated this was either “still a key negative feature” or “worse than 2011”.

It would appear that this statement is in the wrong side of the argument because it would appear that 62% of people surveyed **didn't think** that the Loss of open countryside between settlements was a negative feature and so must have believed it was better than 2011. It should be on the positive side of the debate.

### **Heritage**

4.13 97% of respondents stated that it was important to preserve the settings and views of historic buildings located within the parish. 93% stated that it was important to maintain and enhance the remaining traditional orchards, and public and private allotments in the parish.

See answers in Test 3 Local Gap & 3.3 LGS: I have already stated the poor condition of the allotments with dead or dying trees the once flourishing orchards beset with blossom in the spring are no more. There is only one plot being worked, the lack of water prevents traditional allotments from thriving successfully. To think that Bensham allotments will ever see the return of the good old days of the mid 1950's is a pipe dream.

### **Work travel**

4.14 A large majority of working age respondents commute out of the parish. 42% travel between 5-20 miles to work, and 23% travel more than 20 miles. 14% work from home with a further 5% working elsewhere within the parish.

65% of employed residents travel more than 5 miles to their place of work making Bredon something like a commuter village. Obviously BPC are not encouraging industry to set up within the parish boundaries.

### **Future Residential and Commercial Development**

4.15 84% of respondents wanted new homes to be “Infill development within yards, redundant areas and disused buildings, inside the development boundary”

This is exactly what the allotment site would provide.

4.16 70% agreed that a target of “40% of all new housing development being affordable housing” was an appropriate way to meet the affordable housing needs of the parish, while 91% stated that affordable housing should be prioritised for people with a local connection.

The previous planning application put forward for Bensham allotments would have provided 13 affordable houses from the 33 planned for (40%)

4.17 73% of respondents would encourage the development of more businesses within the parish, with a clear preference for small-scale leisure and tourism-related businesses, such as B&Bs, village shops, cafes and small commercial units.

Does this mean that a Supermarket, Solar Farm or small industrial unit would be accepted by the villagers at the Bensham site?

## **5. Vision & Objectives**

### **Vision**

5.1 The vision for Bredon Parish at the end of the Plan Period in 2030 is as follows.

7 Accessible and sustainable housing will exist for all age groups, including affordable housing for those with local connections.

You will need to explain to all where this local housing will be.

## Objectives

5.2 To achieve this vision a number of key objectives have been identified as follows:

7 To ensure sustainable and sympathetic housing development through design policies which preserve local distinctiveness and character, and which deliver the homes which people need.

The refused planning application to provide 33 houses on 3 ½ acres on Bensham allotments was very thoughtfully planned with a generous green space in the centre together with low density housing.

## 6. Policies

### NP1: Spatial Plan for the Parish

The Neighbourhood Plan directs the majority of future housing, economic and community related development to within the defined Development Boundary of Bredon village and to the site allocated under policy SWDP59/15, in order to build and bolster the role of Bredon as the hub of a resilient parish community.

Development proposals in Bredon village on sites allocated under the strategic policies of the Local Plan will be supported. All other development proposals located outside the defined Development Boundary of any settlement will be strictly controlled and will be limited to proposals which are demonstrably and exceptionally suited to a countryside location.

Where proposals are located within the Cotswolds Area of Outstanding Natural Beauty or its setting, they must demonstrate that they specifically address the provisions of the Cotswolds AONB Management Plan, in respect of:

1. Conserving and enhancing the natural beauty and special qualities of the Cotswolds AONB;
2. Protecting local distinctiveness, tranquillity, sense of place, and the setting of the AONB;
3. Maintaining the historic settlement pattern and mix; 4. Protecting key views of the surrounding countryside.

6.6 This policy sets the spatial strategy for the Neighbourhood Plan. Its objectives are to protect the intrinsic character and beauty of the countryside and to support thriving rural communities within it. It achieves this by primarily focusing development in the village of Bredon, which forms the hub of services in Bredon Parish, although some small infill housing development may be appropriate within the defined Development Boundaries of the other settlements. Outside the Development Boundaries, which have been defined by WDLF saved policy GD1 (Location Strategy for new Development) and strategic policy SWDP 2 (Development Strategy and Settlement Hierarchy), development will be strictly controlled in conformity with development plan countryside policies.

I believe the Bensham allotment site meets the criteria for a small development.

6.7 The SWDP makes active provision for planning for the growth of Bredon Parish during the SWDP plan period (1 April 2006 to 31 March 2030). The market and affordable housing needs of the parish are being addressed through the site allocated under policy SWDP59/15 (delivering 24 homes), through other recently built or approved schemes (delivering 84 homes), and through projected windfall sites (delivering 100 homes). See the Analysis of Actual & Forecast Household Numbers in Bredon Parish (2007-2030), in Appendix 2.

As mentioned before the Oak Lane site which has outline planning permission has still to find a developer who will take this difficult project on. Bredon has promised 65 other home to be built within the next 14 years. I ask again where do BPC see these houses being built?

### **NP3: Design of New Buildings**

Proposals for new buildings will be supported, provided they:

1. preserve or enhance the distinctive local character and historic interest of the parish and demonstrate that they have taken full account of the Bredon Village Design Statement 2011 and relevant conservation area appraisals;
2. make a positive contribution towards the visual amenity of the street scene;
3. make provision for off-road parking commensurate to the use of the building;
4. maintain the tradition of plot size and building orientation in each settlement;
5. with regard to siting – are sensitive to neighbouring buildings, the street scene, and the building line;
6. with regard to height, scale and external appearance – use designs and materials in keeping with the street scene and, wherever it would not be out of place, use traditional local vernacular forms to conserve and enhance the distinctive local character and historic interest of the parish;
7. conserve historic and traditional building features, such as handmade tiles, windows, doors and rainwater goods (or provide equivalent replacements when necessary);
8. be preceded by an archaeological survey where the development is on land which the Worcestershire Archive and Archaeology Service considers should be assessed for its archaeological value;
9. reduce flood risk by ensuring the free running of all watercourses, gullies and culverts and by including sustainable drainage design features which effectively mitigate any adverse effects resulting from the development with relation to surface water run-off and flooding;
10. help to restrict carbon emissions by complying with high energy efficiency standards and utilising low energy design;
11. avoid minerals safeguarding areas and their potential buffer zones;
12. incorporate facilities into the design to allow occupiers to separate and store waste for recycling and recovery.

I believe that all these conditions were met on the refused application concerning Bensham allotments.

### **Appendix 2: Analysis of Actual & Forecast Household Numbers in Bredon Parish (2007-2030)**

Only 39 houses were built on windfall developments in the village of Bredon in the 8 years, 2007 – 2015. Does BPC consider that 4 ½ houses a year is an adequate number?

65 houses are proposed for the period 2016 – 2030 excluding the proposed Oak Lane development of 24 units. To provide land for 65 low volume houses would need an area of land in excess of 7 acres, where does BPC think that land will come from?

### **Appendix 3: Key Views**

Bredon (village)

☒ views into Benshams Allotments and Upstones Orchard from Cheltenham Road (B4079);

I cannot understand the theory which suggests that looking onto an area of dead & dying trees and of unkempt pasture between sprawling farm buildings and the rest of Bredon village is a key view.

### **My Conclusion**

I conclude that not only is a local Gap or Local Green Space inappropriate for Benshams allotments due to its **IN FILL** possibilities, its lack of **traditional orchards** & associated blossom, its lack of “**richness of wildlife**”, lack of **recreational value** due to its private ownership, lack of **public access** and as only one plot on the allotments is currently being used very little landowners recreational activity takes place either.



A small well planned development, such as the one that was refused planning, would enhance the Cheltenham side of the village and provide a good selection of houses including affordable homes for locals especially younger members of the village who at the moment find affording homes within the boundaries of the village too expensive driving many to leave the area for good.

It is noted that in the questionnaire put to local parish residents of those that filled it in 80% were from Bredon, of those 44% were over 65, 46.9% were retired, only 22% were in full time work and only 2.2% were in the 19 – 30 age group. BPC should note that what Bredon really needs is an influx of young professionals buying homes, spending money locally & sending their children to local schools.

I hope I have made my views clear about the feeling of the **“Not in my back yard”** syndrome & the feeling of the fact that someone may have a vested interest in the Plan developing in a certain way.

I hope you give thought to my views and look forward to hearing **back** from you.

Yours sincerely



Robert Drew

Benshams Allotment Landowner

[REDACTED]  
[REDACTED]  
10<sup>th</sup> April 2016

Bredon Parish Council  
Bredon Village Hall  
Main Road  
Bredon  
Tewkesbury  
GL20 7QN

**Re : Bredon Neighbourhood Plan Pre-submission Consultation**

Dear Ms. Shields,

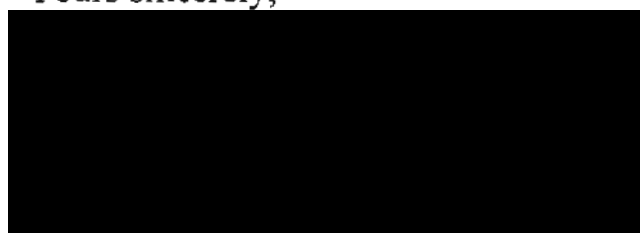
I strongly object to the Bredon Neighbourhood Plan for the following reasons.

1. Owners of land affected by areas designated as Local Green Space and Local Gap were not consulted by the Parish Council prior to the publication of the Pre-submission Draft as required. The Parish Council have blatantly dictated and imposed their wishes over land in private ownership.
2. The land shown as Local Green Space has clearly been included to restrict future development where in many cases, planning applications have previously been made. With reference in particular to land adjoining Tewkesbury road, I understand the National Planning Policy indicates that LGS policies cannot be used to protect extensive tracts of land and therefore, this area is not suitable for its designation.
3. It is clearly obvious that only a minor area of Darby estate land is included as LGS/LG on the proposals. As Adrian Darby owns large areas surrounding the village and bordering main roads, it is inconsistent that his land has been mostly omitted from the proposals. Surely 'key views' extend over his land too.
4. On the subject of preserving views, the occupiers of properties bordering the main road at Westmancote have lost their cherished

previously open views due to the planting of trees on the opposite side of the road on the Darby estate. A number of homes at Queensmead also experience a similar situation.

5. If the projected windfall sites of 100 homes are to be village infill, I very much doubt the availability of such space within the present confines of the village. How can the Parish Council be satisfied they are meeting housing needs up until 2030? Infill development, were it possible, would not provide 40% affordable housing for the young of the Parish which would have been the case on land at Tewkesbury Road. At the time of writing there are 13 homes for sale in Bredon between the price ranges of £225,000 and £725,000, hardly affordable properties for first time buyers. At present I am aware of at least four young people with local connections who are unable to become home owners in the Parish of Bredon. A sad state of affairs.

Yours sincerely,



Please find an amended letter attached (amendments to paragraph 2 and 3). A signed copy will also be delivered to Bredon Parish Council.

I confirm that I would like this amended version to continue into the consultation process, in place of the email from 17th April, as I feel strongly about the other points raised.

Yours Sincerely,

Natalya Dyer

---

Re : Bredon Neighbourhood Plan Pre-submission Consultation

11<sup>th</sup> April 2016

Dear Ms Shields,

I would like to express my opposition to the pre-submission of the Bredon Neighbourhood Plan. It is unfortunate that my first opportunity to do so, comes after the plan has been proposed.

I know the Parish Council will be keen to ensure that the Neighbourhood Planning process maintains the highest standards of transparency and probity to ensure it retains the confidence of all local stakeholders. I am unable to understand what fair and objective process has been undertaken which has led to what I consider to be uneven distribution of Green Space and Local Gap land in this instance. I consider greater clarity is needed regarding the grounds upon which some land is excluded from the plan, in favour of other landowner's property.

Further, my family considers there are clear opportunities for parts of our land to provide a benefits to local residents, but have not been involved in discussing ways that this could be done in an equitable manner.

Another important factor in my opposition to the Local Gap land plan is the future of the village community. With our fantastic advances in modern medicine and increased living standards, each generation is living longer than ever before, resulting in a larger elderly population. This presents a housing shortage in Bredon, especially for affordable homes. A village community is unsustainable without a cross section of ages and the lack of affordable homes is stopping the current generation of first time buyers from living in the village in which they grew up.

I speak from personal experience as I am currently in the process of buying a home and the nearest location I could afford was Northway (three miles outside of the village). Many of my friends whom I went to Bredon Handcock's Primary School with are also in the same position and have been priced out of Bredon, despite working in a commutable distance from the village. It's sad that my generation will not be able to send our children to the village school that we attended, because there are no affordable homes for us to purchase. Instead, my friends and their families have moved

to nearby towns, but not through choice. What will happen in the future, as the young people move away and take their spending power elsewhere? What will happen to the social clubs, the school, to pubs and local businesses? Surely the village needs young people to continue to thrive as a community.

The Local Gap plan is shortsighted and does not have the community's best interests at heart. Bredon has evolved over hundreds of years. Take a look at historic maps of the village to see how it has changed over time, to meet the needs of the local population. Think how different the village would be, if no new homes had been built in the last 50 years. Bredon would not have the same sense of community that it has today.

The current assignment of Local Green Space and Local Gap land in the Bredon Neighbourhood Plan is unacceptable and cannot go ahead in its current state.

Yours Sincerely,

Natalya Dyer

**From:** William Dyer [REDACTED]  
**Sent:** 13 April 2016 21:53  
**To:** [bredonpc@btconnect.com](mailto:bredonpc@btconnect.com)  
**Subject:** BPC Neighbourhood Parish Plan

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11<sup>th</sup> April 2016

Ms Jacqueline Shields  
Bredon Parish Council  
Bredon Village Hall  
Main Road  
Bredon  
Tewkesbury  
GL20 7QN

**Re: Bredon Neighbourhood Plan Pre-submission Consultation**

Dear Ms Shields,

This letter is made in response to the current consultation on the pre-submission version of the Bredon Neighbourhood Plan.

The Parish Council has failed to notify myself regarding the proposed designation of land within my ownership as both a Local Gap (GAP4) and Local Green Space (LGS6). Both of the proposed designations fail to have regard to national planning policy requirements, specifically the need for neighbourhood plans to deliver sustainable development. This requirement is also underpinned by way of the legal requirements that the neighbourhood plan will be required to meet as set out in schedule 4b of the Town and Country Planning Act (as amended).

The Parish Council have not sought to consult myself regarding either designations prior to the current consultation commencing. It is not considered that the Policy NP2 is informed by any robust evidence to justify its inclusion within the plan. The proposed Local Green

Space also fails to meet all three tests that are required by the National Planning Policy Framework.

The land in question is in private ownership and is not available to be used for public use I therefore fundamentally oppose both designations. It is not considered that the evidence available to support the inclusion of the identified Local Green Space, or Local Gap, in the manner that has been approached is consistent with the requirements of National Planning Policy Framework and the Planning Practice Guidance. The land identified by these policies has been done so in order to restrict development on land adjacent to the settlement boundary and beyond. The National Planning Policy Framework is clear that Local Green Space policies cannot be used to protect extensive tracts of land. The areas identified by the supporting policies maps are being used to restrict growth in a sustainable location without any reasoned justification supported by robust evidence. This undermines the purpose of Local Green Space policies which should be identified in accordance with the criteria listed in paragraph 77 of the NPPF. With regards to LGS6, the identified designation is considered to represent an extensive tract of land and not suitable for its designation.

The Neighbourhood Plan further seeks to prevent growth through an overlapping policy constraint through the proposed Local Gaps. The Neighbourhood Plan seeks to deliver a non-Framework compliant approach which is essentially attempting to designate a landscape based designation on the open countryside. It is inappropriate to define 'Local Gaps' as this approach does not accord with national policy as it seeks to implement a strategic policy of its own that is not supported in the adopted South Worcestershire Development Plan. The neighbourhood plan as proposed will have severe implications for the delivery of sustainable growth opportunities in Bredon.

Land at Tewkesbury Road would be able to deliver numerous benefits to the people of Bredon and would help assist in the delivery of the neighbourhood plan's wider objectives which, at present, are unlikely to be delivered.

My land should be considered as a potential allocation or housing reserve site to meet the housing needs of the village and wider area.

Would you kindly email a receipt for this letter.

Yours sincerely

William Dyer



29 March 2016

Bredon & Bredon's Norton Parish Council  
Bredon Village Hall  
Main Road, Bredon  
Tewkesbury GL20 7QN

Dear Sirs

**Pre-Submission Draft of the Bredon Parish Neighbourhood Plan**

On behalf of my brother, Joseph Evans, I am writing to acknowledge receipt of your letter dated 6 March 2016.

As Joe is not well at the moment, I have looked at the Submission and noted various sections which I can bring to his attention at some point, when possible.

Joe has said that he wouldn't want any changes to his land (orchard) or to the shared access way.

Yours faithfully



Pam McConnell (Mrs)

For Joseph Evans



Bredon  
Neighbourhood Development Plan  
Pre-Submission Version



April 2016

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## APPENDICES

Appendix 1      Location Plan

# 1 EXECUTIVE SUMMARY

## 1.1 Context

- 1.1.1 These representations provide Gladman Developments Ltd (Gladman) response to the current consultation held by Bredon Parish Council (BPC) on the pre-submission version of the Bredon Neighbourhood Plan (BNP) under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.
- 1.1.2 Through these representations, Gladman seek to clarify the relationship of the neighbourhood plan to both national and local policy requirements. This submission provides an analysis of the neighbourhood plan as currently drafted, highlighting areas in which we feel the document currently lacks clarity or where there is insufficient justification for the policies that the Plan seeks to adopt.
- 1.1.3 As currently proposed Gladman are of the opinion that the pre-submission version of the BNP is fundamentally flawed. If the Plan is to progress under Regulation 15 then substantial modifications to the Plan as proposed are required through the deletion of several restrictive policies that do not conform with the requirements of national planning policy, guidance or the neighbourhood plan basic conditions.
- 1.1.4 Both Wychavon District Council (WDC) and the Parish Council **will be aware of Gladman's land** interests in Bredon at land off Tewkesbury Road. These representations also include a site submission for the site to be considered in the first instance as a housing allocation to meet identified housing needs, with a secondary position for its allocation as a housing reserve site.
- 1.1.5 Gladman would like to offer their assistance in preparing the neighbourhood plan and addressing the technical issues and invite the Parish Council to get in touch regarding this.

## 2 **LEGAL REQUIREMENTS, NATIONAL POLICY & JUDGEMENTS**

### 2.1 Legal Requirements

2.1.1 Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The Basic Conditions that the BNP must meet are as follows:

- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.
- d) The making of the order contributes to the achievement of sustainable development.
- e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- f) The making of the order does not breach, and is otherwise compatible with, EU obligations.

### 2.2 National Planning Policy Framework, & Planning Practice Guidance

2.2.1 **The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied.** In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role in which they play in delivering sustainable development to meet identified development needs.

2.2.2 At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making and decision-taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet Objectively Assessed Needs (OAN) for housing, with sufficient flexibility to adapt to rapid change. This requirement is also applicable to neighbourhood plans.

2.2.3 The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 16 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies that plan positively to support local development to meet identified housing needs.

2.2.4 Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood Plans should seek to proactively drive and support

sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

- 2.2.5 Paragraph 49 of the Framework is clear that ***‘relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites’***. This applies not only to statutory Development Plan documents but is also **applicable to both emerging and ‘made’ neighbourhood plans**. This has also been confirmed in the High Court (see section 2.3).
- 2.2.6 Paragraph 184 of the Framework states that neighbourhood plans must be in general conformity with the strategic priorities of the Local Plan and that neighbourhood plans should reflect these policies and plan positively to support them.
- 2.2.7 Key sections of the PPG were recently updated on 11<sup>th</sup> February 2016. It is clear from both the Framework and PPG that neighbourhood plans must conform to national policy requirements (basic condition (a): **“appropriateness”**) and the need to take account the most up-to-date evidence of housing needs<sup>1</sup>. Whilst the neighbourhood plan seeks to deliver the level of housing identified in the adopted development plan this should not be seen as a cap on development but the minimum housing number that the plan should seek to deliver.

## 2.3 High Court Judgement

### Woodcock Judgment

- 2.3.1 The Woodcock High Court judgment demonstrates the implications for progressing a neighbourhood plan where there is no local plan in place nor a five year housing land supply. In summary, this High Court judgment demonstrates the following key points:
- That §14 and §49 of the Framework in regard to five year housing land supply and the weight to be given to extant housing land supply policies applies equally to both **emerging and ‘made’ neighbourhood plans as other development plan documents** otherwise adopted and/or emerging by the local planning authority.
  - There is nothing in policy or statute that elevates neighbourhood planning to a level above the wider development plan that enables special consideration.
  - Neighbourhood plans must respect national policy and the core planning principles outlined within the Framework.
  - Prematurity must be assessed against the whole of the requirements of the PPG. In neighbourhood planning, there is no requirement for planning bodies to produce an objective assessment of housing needs, as there is no requirement to consider the effectiveness or justification of a plan.

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<sup>1</sup> PPG Paragraph 040, Reference ID: 41-040-20160211

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### Crownhall Judgment

- 2.3.2 On 21<sup>st</sup> January 2016, Holgate J handed down judgment in R(Crownhall Estates Limited) v Chichester District Council [2016] EWHC 73 (Admin), summarising the respective legislation at §12-28 and the relevant principles for the progression of neighbourhood plans at §29.
- 2.3.3 Crownhall was not subject to a further appeal to the Court of Appeal and therefore represents the most recent judgment of the High Court on neighbourhood planning. However, this judgment does not mark the end of policy development in this area, nor is it a definitive constraint on the exercise undertaken by a Neighbourhood Plan Examiner.
- 2.3.4 On 11<sup>th</sup> February 2016, the Secretary of State published a number of updates to PPG as highlighted in section 2.2 of these representations. In particular, the changes to the PPG stress the importance of considering housing reserve sites, and providing indicative delivery timetables to ensure that emerging evidence of housing needs is addressed to help minimise any potential conflicts that can arise and are not overridden by a new Local Plan.
- 2.3.5 It is important to note that the PPG was drafted following the judgment in Crownhall and therefore remains a material consideration for the purposes of basic condition 8(2)(a) and indeed the assessment of basic conditions 8(2)(d) and (e).

## **2.4 Significantly boosting the supply of housing and the presumption in favour of sustainable development**

- 2.4.1 The BNP should be aspirational and growth orientated in line with the key objectives of national policy, especially the requirement under §47 of the Framework which seeks to significantly boost the supply of housing.
- 2.4.2 The recent Secretary of State appeal decision in Ringmer, East Sussex<sup>2</sup> (for a residential development of up to 110 dwellings) has been granted planning permission on a site which is allocated within a draft neighbourhood plan but which would result in a development of a greater scale than that envisaged by the draft neighbourhood plan.
- 2.4.3 In this case, the Secretary of State identifies that although the proposed development would conflict with the emerging neighbourhood plan in terms of the quantity of housing proposed on the site, it would not represent a substantial uplift over the minimum proposed in the neighbourhood plan. The Secretary of State also agreed with the Inspector that there is no evidence that the delivery of the site would give rise to any substantive harm or that the proposed development is so substantial that to grant planning permission would prejudice the neighbourhood plan-making process by determining decisions about the scale, location and phasing of new residential development.

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<sup>2</sup> APP/P1425/W/14/3001077 – 5<sup>th</sup> January 2016.

2.4.4 The recent decision of the Secretary of State for a residential development of 18 dwellings in St Just in Roseland, Truro<sup>3</sup> **shares the Inspector's view that policies relating to the supply of housing** contained within the Roseland Neighbourhood Development Plan (RNDP) provide little certainty that the relevant housing policies contained within the RNDP would deliver sufficient housing to meet the needs of the area over the period of the plan. Having applied paragraph 49 of the Framework the Secretary of State attributes little weight to the relevant housing policies of the RNDP as the Local Planning Authority are unable to demonstrate a deliverable five year housing land supply.

2.4.5 **The Inspector's** decision states that:

*"Housing supply policies in Neighbourhood Plans are not exempted from the effect of paragraph 49 and the presumption in favour of paragraph 14 of the Framework. ...The RNDP does not seek to quantify the housing needs of the area or allocate specific sites to meet that need. Consequently, the policies of the plan are not formulated on the basis of understanding the OAN for the housing market area or the specific housing needs of the Roseland, in numerical terms. In the absence of an understanding of the needs of the area, it is not possible to demonstrate a five-year supply of housing sites. ...Relevant policies for the supply of housing within the RNDP cannot be considered up-to-date."*

2.4.6 The Woodcock High Court judgment<sup>4</sup> demonstrates the implications of progressing a Neighbourhood Plan where there is no Local Plan in place, nor a 5 year housing land supply. This judgment is further supported by the recent PPG updates which confirms that Paragraph 49 applies to policies in statutory Development Plan Documents which have been adopted or approved in relation to local planning authority area. It also applies to policies in emerging and 'made' neighbourhood plans.

2.4.7 In line with the requirement set out at §14 and §49 of the Framework in the event that the Council is unable to demonstrate a five year housing land supply then relevant policies for the supply of housing, including those identified in the neighbourhood plan, should not be considered up-to-date.

2.4.8 In light of the above the BNP will need to ensure that it allows for sufficient flexibility to respond to adverse market issues.

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<sup>3</sup> APP/D0840/W/15/3003036 – 3<sup>rd</sup> February 2016.

<sup>4</sup> Woodcock Holdings Ltd v SoSCLG [2015] EWHC 1173 (Admin)

## 3 **DEVELOPMENT PLAN**

### 3.1 **South Worcestershire Development Plan**

- 3.1.1 Attention is drawn to §3.4 of the BNP which sets out those saved policies of the 2006 Wychavon District Local Plan. These policies no longer form part of the statutory development plan to which the BNP should have regard to. Reference to the 2006 Local Plan and supporting policies maps should be deleted and updated to reflect the current Development Plan for Wychavon District.
- 3.1.2 The current Development Plan for Wychavon District consists of the South Worcestershire Development Plan (SWDP) adopted on 25<sup>th</sup> February 2016 and has superseded the previous saved policies contained in the 2006 Local Plan. The SWDP provides the overarching spatial strategy for Wychavon District, Malvern Hills District Council and Worcester City Council to 2030.
- 3.1.3 The emerging BNP will need to ensure that it aligns itself with the strategic policies contained in this document. It is important to note that the Council under its Duty to Cooperate, will give due consideration to the need to review the SWDP to meet the housing needs of neighbouring local planning authorities.
- 3.1.4 Should the SWDP fail to delivery its objectives, or if the policy context for the area changes then a review of the Local Plan will be undertaken. At present, there is no statutory measures which enable a review of a neighbourhood plan to be undertaken. Therefore, the BNP will need to ensure that it is able to cover an appropriate time horizon and plan for the need to accommodate additional housing needs or it will run the risk of being superseded by the provisions of s38(5) of the Planning and Compulsory Purchase Act 2004.



## 4 BREDON NEIGHBOURHOOD PLAN

### 4.1 Context

4.1.1 These representations are made in response to the current consultation on the pre-submission version of the BNP, under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. This chapter of the submission highlights the key points that Gladman would like to raise with regard to the content of the BNP as currently proposed.

4.1.2 **Gladman question the Parish Council's justification for the inclusion of several policies and the way** in which the plan has been prepared. The Plan as currently proposed is considered to be inconsistent with the requirements of national planning policy. The BNP as presented cannot be considered to be a Plan that has been positively prepared as it allows for no flexibility through appropriate measures to ensure that it is able to react to changes in the market.

4.1.3 If the Plan is progressed and submitted to SWDC for Examination in its current form it will likely be found inconsistent with basic conditions (a), (d) and (e) and will be unable to proceed to Referendum.

### 4.2 The suitability of Bredon to support growth

4.2.1 The suitability and sustainability of Bredon as a settlement for growth is reflected in its designation **as a Category 1 village in the adopted SWDP. The Category 1 village is defined as 'towns and villages with a good range of services and facilities, as well as some access to public transport.'**

4.2.2 Bredon has been allocated the lowest growth for this tier of settlements, despite being more sustainable than other Category 1 villages. Gladman recommend that it is more appropriate for the neighbourhood plan to allocate housing/reserve sites rather than relying on windfall development to deliver 100 additional dwellings.

### 4.3 Parish Housing Numbers

4.3.1 In addition to the comments raised in section 2.2, new housing is often required to ensure that existing population levels are maintained. To illustrate this point, taking account of the demographics of the Bredon neighbourhood area between the last two Census periods reveals a decreasing household size.

4.3.2 The 2001 Census confirms that the total population of Bredon was approximately 2,438 and the total number of dwellings was 1,012, this equates to an average household size of 2.4. As of the 2011 Census, the population of Bredon has increased to 2,504 residents across 1,060 households, resulting in a decline in the average household size to 2.36.

4.3.3 Putting this another way, in order to maintain the existing population levels and services available to residents within Bredon, whilst allowing for a decline in household sizes, will therefore require an increase to the total housing numbers for the area. Whilst this is an illustrative measure this has been based on statistics contained in Census data.

## 4.4 Bredon Neighbourhood Plan Policies

- 4.4.1 This section of the representations highlights policies which need to be addressed and amended through modification and/or deletion should the plan progress to post submission consultation. Failure to do so will likely result in the BNP being found inconsistent with basic conditions (a), (d) and (e) at examination and will subsequently be unable to progress to Referendum.

### Policy NP1: Spatial Plan for the Parish

- 4.4.2 Gladman does not support the **BNP's** intention which seeks to direct growth to within a tightly drawn settlement boundary, this approach would act to contain the future physical growth of the settlement. This allows no flexibility should the housing needs of the wider area change which may require Bredon to accommodate additional housing growth.
- 4.4.3 Gladman recommend that a more flexible approach to meeting development needs is required through a criteria based approach as advocated through the requirements of the Framework. In this regard it is recommended that Policy NP1 be deleted in its current form and replaced with the following wording:

*'When considering development proposals, the Parish Council will take a positive approach to new development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.*

*Development adjacent to the existing settlements should be permitted provided that the adverse impacts do not significantly and demonstrably outweigh the benefits of development.'*

### Policy NP2: Local Gaps and Key Views

- 4.4.4 This policy seeks to implement a number of Local Gaps and Key Views on the basis of Policy SWDP 2 (D) of the adopted Local Plan. As acknowledged by the supporting evidence to the plan, Policy SWDP2 (D) is only intended to apply to buffers separating smaller rural settlements from urban areas within the plan area. Gladman object to the inclusion of this policy. The identification of a Local Gap is a strategic policy that can only be confirmed in the adopted Local Plan. The SWDP did not seek to allocate land in this location as a Local Gap. It is not the place of the neighbourhood plan to implement strategic policies that would prevent the delivery of future sustainable growth.
- 4.4.5 The recent case of *Suffolk Coastal District Council v Hopkins Homes Ltd & Richborough Estates Partnership LLP v Cheshire East Borough Council* dated 17<sup>th</sup> March 2016 is informative on this point and the wide interpretation that such designations are relevant to the supply of housing. In the event that the Council is unable to demonstrate a 5 year housing land supply, this policy will also be considered out of date.
- 4.4.6 The restriction made by the neighbourhood plan to prevent future sustainable growth through policies NP1 and NP2 has not been made in accordance with the positive approach required by the Framework as the Plan fails to consider the need for additional housing land.

- 4.4.7 In particular, Gladman object to the inclusion of GAP4 given that coalescence would not occur in this area as an appropriate buffer is provided by the M5 would serve to prevent this.
- 4.4.8 The BNP identifies key views in appendix 3 for the purpose of preventing a development proposal that it considers will have a significant detrimental impact on an important view. This aspect of the policy NP2 seeks to implement a further housing constraint policy and therefore cannot be considered to be in conformity with the need to contribute to the delivery of sustainable development. It is not clear from appendix 3 where these views are located should be identified on a policies map to provide a clear indication of how this policy should be applied. Further, sustainable development can often be delivered through appropriate design considerations that will not affect local landscape or important views. §113 of the Framework refers to the need for criteria based policies in relation to proposals affecting protected wildlife or geodiversity sites or landscape areas, and that that protection should be commensurate with their status and gives the appropriate weight to their importance and contribution to wider networks. As currently drafted Gladman do not believe this landscape policy aligns with the Framework and is therefore inconsistent with basic conditions (a) and (d).

#### Policy NP3: Design of New Buildings

- 4.4.9 The above policy sets out a list of design principles that new development in Bredon must deliver. Whilst recognising the importance of good design, design policies should avoid unnecessary prescription or detail and should not be used to inflexibly impose architectural styles or particular tastes which can stifle innovation or originality through unsubstantiated requirements to conform to development styles. Gladman submit that any future design policies should be made with strict accordance to §59 and §60 of the Framework.
- 4.4.10 **Part 11 states ‘avoid minerals safeguarding areas and their potential buffer zones’.** Firstly, this is not a design policy and seeks to establish a more onerous requirement than that confirmed in the adopted Policy SWDP 32. Gladman recommended this part of the policy is deleted.
- 4.4.11 This matter is also applicable to policies NP4-NP6. Gladman consider that in a number of instances these policies place prescriptive requirements on development proposals with no regard to the viability and delivery of future sustainable development, contrary to basic conditions (a) and (d).
- 4.4.12 Furthermore, whilst supporting the principle of reducing carbon emissions to comply with energy efficiency standards, these requirements will be delivered through new building regulations. Therefore, there is no reason for such a policy to be included within the neighbourhood plan.

#### Policy NP9: Local Listed Buildings & Structures

- 4.4.13 This policy identifies buildings and structures considered to be worthy of protection as heritage assets. This policy needs to be amended to reflect the fact that this relates to solely non-designated heritage assets.

- 4.4.14 Further, it would be useful if a map was provided to identify the location of each identified structures within the neighbourhood area so that a decision maker can apply this policy consistently and with ease.

Policy NP10: Community Facilities & Assets of Community Value

- 4.4.15 In principle, Gladman support this policy which identifies established community facilities that the Parish Council wish to improve by way of extension or partial redevelopment.
- 4.4.16 Gladman question how the identified areas will be improved without the necessary financial contributions that could be provided through developer contributions (where appropriate) which can help aid the expansion of these services to ensure that they continue to operate viably.

Policy NP13: Local Green Space

- 4.4.17 This policy seeks to designate land for the purposes of LGS under §76 and §77 of the Framework. This policy identifies a total of 10 LGS designations.
- 4.4.18 In order to designate land as LGS the Parish Council must ensure that it is able to demonstrate robust evidence to meet national policy requirements set out in the Framework. The Framework makes clear at §76 that the role of local communities seeking to designate land as LGS should be consistent with the local planning of sustainable development for the wider area. Paragraph 76 states that:

*‘Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.’*

- 4.4.19 Further guidance is provided at §77 which sets out three tests that must be met for the designation of LGS and states that:

*‘The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:*

- *Where the green space is in reasonably close proximity to the community it serves;*
- *Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreation value (including as a playing field), tranquillity or richness of its wildlife; and*
- *Where the green area concerned is local in character and is not an extensive tract of land.’*

- 4.4.20 The requirements of the Framework have now been supplemented by the advice and guidance contained in the PPG. Gladman note paragraph 007 of the PPG<sup>5</sup> which states, *‘Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used to in a way that undermines this aim of plan making.’*
- 4.4.21 Gladman further note paragraph 015 of the PPG (ID37-015) which states, *‘Paragraph 77 of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name.’* Designation of LGS should not be used as a mechanism to designate new areas of Green Belt (or similar), as the designation of Green Belt is inherently different and must meet a set of stringent tests for its allocation (paragraphs 82 to 85 of the Framework).
- 4.4.22 Taking the requirements of national policy and the guidance into account, the designation of land at Tewkesbury Road fundamentally fails to meet all three tests that must be met for the designation of land as LGS. Gladman consider that this represents a significant tract of land measuring approximately 5.2ha, it is therefore not appropriate to designate this land as LGS.
- 4.4.23 This issue has been previously explored in a number of **Examiner Report’s** across the country. Gladman highlight the following Examiner’s Reports:
- **The Backwell Neighbourhood Plan Examiner’s Report**<sup>6</sup> recommended the deletion of two LGS designations measuring approximately 19ha and 32ha respectively and found both designations did not have regard to national policy which states that LGS should only be used **where the area concerned ‘is not an extensive tract of land.’**
  - **The Seldlescombe Neighbourhood Plan Examiner’s Report**<sup>7</sup> recommended the deletion of a LGS measuring approximately 4.5ha as it was found to be an extensive tract of land.
  - The Oakley and Deane Neighbourhood Plan Examiners Report<sup>8</sup> recommended the deletion of a LGS measuring approximately 5ha and also found this area to be not local in character. Thereby failing to meet 2 of the 3 tests for LGS designation.
  - **The Alrewas Neighbourhood Plan Examiner’s Report**<sup>9</sup> identifies that both sites proposed as LGS **in the neighbourhood plan ‘in relation to the overall size of the Alrewas Village’** to be extensive

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<sup>5</sup> PPG Paragraph 15 – Reference ID: 37-015-20140306

<sup>6</sup> <http://www.backwell-pc.gov.uk/public/images/backwell-neighbourhood-plan-examiners-report.pdf>

<sup>7</sup> <http://www.rother.gov.uk/CHttpHandler.ashx?id=22996&p=0>

<sup>8</sup> <https://www.basingstoke.gov.uk/content/doclib/1382.pdf>

<sup>9</sup> <https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Neighbourhood-plans/Downloads/Alrewas/Alrewas-Neighbourhood-Plan-Examiners-Report.pdf>

tracts of land. The Examiner in this instance recommended the deletion of the proposed LGSs which measured approximately 2.4ha and 3.7ha.

- 4.4.24 **Highlighted through a number of Examiner's Reports** set out above and **other 'made'** neighbourhood plans, it is considered that land at Tewkesbury Road has not been designated in conformity with national policy and subsequently is not in accordance with the basic conditions.
- 4.4.25 Whilst the Parish Council have sought to undertake some form of evidence base it does not overcome the failure to meet the specific policy requirement set out above with regards to the scale of land to be designated and therefore the designation of land at Tewkesbury Road has not been made in accordance with basic conditions (a) and (d).
- 4.4.26 If this policy is progressed it will likely be found unable to meet the basic conditions due to the reasons set above. Gladman recommend that Policy NP13 be deleted in its entirety.

#### Policy NP14: Landscape & Biodiversity

- 4.4.27 Gladman consider that new development can often be delivered without having an adverse impact on the local landscape and biodiversity assets of a local area.
- 4.4.28 The comments made in response to NP2 are also applicable to this policy and consider that any landscape policies contained in the plan need to be revisited to ensure consistency with the **requirements of national planning policy. Failure to do so may risk the plan's ability to meet basic condition (a).**

## 4.5 General Comments

### Public Consultation

- 4.5.1 Land at Tewkesbury Road (proposed LGS6/GAP4) is within private ownership and is not available for the proposed designations. Prior to the current consultation commencing at no point has the Parish Council sought to engage with the landowner of this site. This is a clear fundamental failing of appropriate plan preparation and is strictly inconsistent with the guidance contained in the PPG which advises that a qualifying body should contact landowners at an early stage about proposals to designate any part of their land as LGS<sup>10</sup>. The letter dated 6<sup>th</sup> March 2016 invites those with land interests in the Parish to consult on the pre-submission of the plan. Prior to this no formal contact has been sought for the designation of land at Tewkesbury Road for the designation of LGS or Local Gap. As outlined in response to NP13 this designation fails to comply with the requirements of all three tests required for its designation. Gladman recommend that both LGS6 and GAP4 need to be deleted from the neighbourhood plan as their designation is inconsistent with basic conditions (a), (d) and (e).

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<sup>10</sup> Paragraph: 019 Reference ID: 37-019-20140306

### Implementation

- 4.5.2 The BNP states that the Plan will be reviewed half way through the plan period or coincide with any Local Plan review. Gladman take this opportunity to make the Parish Council aware that there is no statutory legislation in place to which a review of the neighbourhood plan can be undertaken, this can only be achieved through its whole-scale replacement.
- 4.5.3 If the Parish Council decide to undertake a review then it must be made clear to the local community that the Plan will be required to complete all relevant statutory regulation stages including all evidence gathering, pre-submission consultation, submission, post-submission consultation and examination **requirements before the Plan can be 're-made'**. This is likely to be a time exhaustive and costly exercise. It is advised that significant flexibility is required throughout the Plan to ensure that it can endure to its end date.
- 4.5.4 Furthermore, it is noted that the Plan seeks to secure a number of aspirations to which the Parish Council will seek sources of funding, in particular from developer contributions, to deliver some or **all of the aspects of the Plan's aspirations**. In this regard, Gladman highlight that developer contributions can only be secured where they are necessary to mitigate against the adverse impacts of development and must be in secured in accordance with §204 of the Framework. Given the Plan does not identify any additional land for housing development for the immediate future it is unlikely **that a number of the Plan's aspirations will be secured** and therefore the deliverability of the Plan and are objectives is brought into question.

## 5 **SITE SUBMISSION**

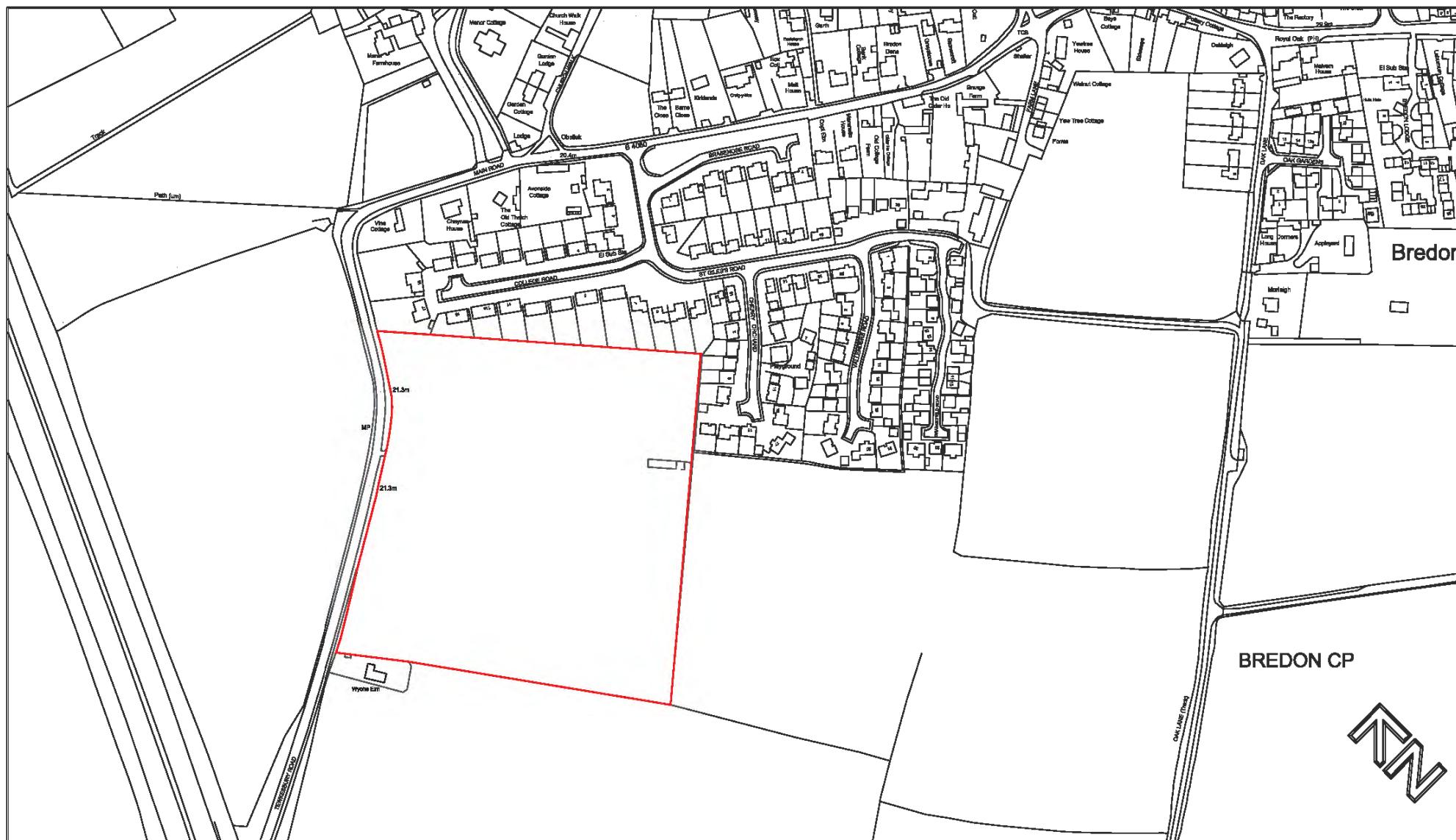
### 5.1 Land at Tewkesbury Road, Bredon


- 5.1.1 **The Parish Council are aware of Gladman’s land interests in** Bredon at land at Tewkesbury Road. The extensive evidence prepared by Gladman demonstrates that the site is suitably located with good access to the **settlement’s** services and facilities. A location plan for the site is contained at Appendix 1 of these representations.
- 5.1.2 The development of land at Tewkesbury Road represents a logical extension of Bredon that would assist the Council in demonstrating a flexible and continuous supply of housing. The development of this site has the potential to create a number of significant benefits for the local community and the surrounding area, including the provision of New Homes Bonus payments, new employment opportunities through the development and investment in infrastructure. These benefits can help address how the neighbourhood plan will deliver its wider plan objectives and a number of its community aspirations.
- 5.1.3 Gladman’s primary position is that land at Tewkesbury Road should be included within the BNP as a potential allocation, with a secondary position for the site to be considered as a reserve allocation.



## 6 CONCLUSIONS

- 6.1.1 Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that the BNP must be consistent with national planning policy and align itself with the strategic needs for the wider area. If the Plan is found unable to meet the basic conditions at Examination then the Plan will be unable to progress to Referendum.
- 6.1.2 In order for the Plan to proceed and meet all of the neighbourhood plan basic conditions it is advised that a more flexible approach to plan preparation is required in order to ensure that the Plan is able to respond to sustainable development proposals that may be required over the course of the plan period.
- 6.1.3 In its current form, the BNP sets out an overly restrictive approach in its entirety and does not allow for any additional growth opportunities from being delivered. This has been established through a series of restrictive policies which include a tightly defined settlement boundary, extensive LGS and Local Gap designations. The Plan needs to ensure that it allows for greater flexibility through fundamental overhaul to the development strategy as proposed.
- 6.1.4 If the Parish Council fail to undertake the significant changes required, as recommended throughout these representations, then the BNP will likely be found inconsistent with the basic condition (a), (d) and (e) if progressed to Examination in its current form and subsequently will likely be found unable to progress to Referendum.



 <p><b>GLADMAN</b> Gladman House, Alexandra Way Concord Business Park Conington, Cambridgeshire CB12 1LB Tel: 01260 285805 Fax: 01260 285801 www.gladman.co.uk</p>				Project	Tewkesbury Rd, Bredon	Drawn by R.Black	Issue date Sept 13
	Rev	Date	By	Revision notes		Scale(s)	1:2500 @ A3
	Status				Title	Location plan	Drawing No 2013-046/101
	Planning						



TEL. [REDACTED]

Ms Jackie Shields  
Bredon Parish Council  
Bredon Village Hall  
Main Road  
Bredon  
Tewkesbury  
GL20 7QN

12 March 2016

Dear Ms Shields

**BREDON PARISH NEIGHBOURHOOD PLAN - LANDOWNER CONSULTATION**

I am writing on behalf of Adrian and Matthew Darby in response to your letter of 6 March 2016.

We are grateful to you for drawing attention to fact that the plan proposes designating certain areas as Local Green Space or Local Gaps.

The Kemerton Estate owns part or all of six proposed areas of Local Green Space and Local Gaps. In total, the area owned by the estate which has been proposed for one of these two designations covers approximately 35 acres (14.2 hectares). Our sites are as follows:

- all of LGS4 owned by Adrian Darby
- substantial parts of LGS5 owned by Adrian Darby
- part of LGS7 owned by Adrian Darby
- substantial parts of GAP1 owned separately by Adrian Darby and Matthew Darby
- substantial parts of GAP2 owned by Adrian Darby
- substantial parts of GAP3 owned by Adrian Darby

We have no objection to the inclusion of our land in the above areas. We welcome the fact that normal agricultural activities will not be affected by the designations. We are supportive of Policies NP2 and NP13.

Overall, the estate is supportive of the Pre-Submission Draft Neighbourhood Plan. As long-term custodians of land within the parish, we particularly welcome the emphasis that the plan places on directing the majority of new development to within the village development boundaries, and on preserving the special qualities and local distinctiveness of the different settlements within the parish.

Yours sincerely

Mrs Janet Cunningham  
Estate Secretary



**15<sup>th</sup> April 2016**

**Ms Jacqueline Shields  
Bredon Parish Council  
Bredon Village Hall  
Main Road  
Bredon  
Tewkesbury  
GL20 7QN**

**Re: Bredon Neighbourhood Plan Pre-submission Consultation.**

**Dear Ms Shields,**

**I strongly oppose the pre-submission version of the Bredon Neighbourhood Plan.**

**I do not agree with the Bredon Parish Council's heavy handed approach in allocating part of my land as Local Green Space. I have neither been consulted on this subject by the Parish Council, nor have been notified of their intentions by letter which I now understand does not follow the guidelines for national planning policy. This land at Bredons Norton is in private ownership and I do not want the category of Local Green space forced on my land.**

**Yours sincerely**

**Mr. M. Meadows**



Our Ref: 5090/MC/DGW

Bredon Parish Council  
Bredon Parish Clerk  
Ms Jacqueline Shields  
Bredon Village Hall  
Main Road  
Bredon  
Tewkesbury  
GL20 7QN

11<sup>th</sup> April 2016

Dear Ms Shields

## **Bredon Parish Neighbourhood Plan 2015-2030 Pre-Submission Plan Consultation**

### **Background**

Bredon Parish Neighbourhood Plan 2015-2030: Pre-Submission Plan has been published by Bredon, Bredon's Norton & Westmancote Parish Council for Pre-Submission Consultation under the Neighbourhood Planning (General) Regulations 2012 (as amended)<sup>1</sup>.

The following representation is submitted on behalf of John, Peter and Samantha Mitchell in accordance with The Neighbourhood Planning (General) Regulations 2012 (as amended). The Mitchell's farm around 214 hectares (530 acres) within the locality; their enterprise is operated on a mixed enterprise system of sheep, cattle and arable. That enterprise is a local employer and makes a significant contribution to the local economy; through the procurement of services, equipment, animal feed and the production of food.

A significant area of that land holding has been identified within the emerging Bredon Parish Neighbourhood as a proposed 'Local Gap'. In particular, the emerging designation labeled 'Gap 5', as illustrated within the Bredon Parish Neighbourhood Plan - Policies Map A, is centered on our Clients' principal complex of farm buildings and the hub of the farming enterprise. This representation raises objections to that emerging designation on the basis that it:

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<sup>1</sup> The Neighbourhood Planning (General) Regulations 2012 (as amended)



- is not supported by the Framework<sup>2</sup>;
- was not identified within the recently adopted and operative South Worcestershire Development Plan (SWDP)<sup>3</sup>, nor are there any provisions within that plan for such a designation;
- is unnecessary in meeting the stated objectives of emerging Policy 2: Local Gaps and Key Views in the emerging Neighbourhood Plan;
- fails three of the four tests devised by Bredon Parish Council for identifying Local Gaps; and,
- unnecessarily adds an additional layer of planning restrictions, that would result in obstructing the sustainable economic growth of the successful farm enterprise run by our Clients contrary the operative development plan and the directives set by the Framework; particularly those objectives that seek to secure a prosperous rural economy.

## **Introduction**

Provision for Neighbourhood Planning is made through the Town and Country Planning Act (1990) (as amended)<sup>4</sup>, the Planning and Compulsory Purchase Act 2004 (as amended)<sup>5</sup>, the Localism Act 2011<sup>6</sup> and the Neighbourhood Planning (General) Regulations 2012.

In addition, the Framework<sup>7</sup> outlines that '*neighbourhood Planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community.*' Whilst the Planning Practice Guidance<sup>8</sup> makes explicitly clear that '*a policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and **supported by appropriate evidence**. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.*' (Our Emphasis)

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<sup>2</sup> National Planning Policy Framework, published March 2012

<sup>3</sup> South Worcestershire Development Plan 2006-2030, adopted February 2016

<sup>4</sup> Sections 61E, 61F, 61G, 61H, 61I, 61J, 61K, 61L, 61M, 61N, 61O, 61P and 61Q of the Town and Country Planning Act 1990 (as amended)

<sup>5</sup> Sections 38, 38A, 38B and 38C of the Planning and Compulsory Purchase Act 2004 (as amended)

<sup>6</sup> Part 3, Chapter 3 of Localism Act 2011

<sup>7</sup> Paragraphs 183-185 of National Planning Policy Framework

<sup>8</sup> Paragraph: 041 Reference ID: 41-041-20140306 of National Planning Practice Guidance

Thus, the emerging Neighbourhood Plan must; i) accord with national policy and guidance; ii) clearly demonstrate the Plan and its emerging policies will help to achieve sustainable development; iii) be in general conformity with the strategic policies contained in the development plan; and, iv) adhere to EU Obligations and observe other basic conditions.

In addition, in preparing this representation reference has also been given to guidance published on neighbourhood planning by Planning Aid England, the Local Government Association and the Planning Advisory Service.

### **Emerging Neighbourhood Plan Policy 2: Local Gaps and Key Views and Assessment of Local Gaps in Bredon**

In order to properly address proposed Policy 2: Local Gaps and Key Views, it is first prudent to examine the emerging policy, its justification and the evidence base used to inform it.

Policy 2: Local Gaps and Key Views outlines that:

***'The Neighbourhood Plan defines Local Gaps on Policies Map A for the purpose of applying development plan policy. In order to prevent the coalescence of settlements and to protect their setting, land within the defined Local Gaps will be kept open and essentially free of development. Minor development proposals may, however, be permitted if they do not harm, individually or cumulatively, the function and purposes of a Local Gap, or its open character.'***

***'The Neighbourhood Plan defines Key Views within and around Bredon village for the purpose of preventing development proposals that will obscure a view by way of its scale, massing or height.'***

In examining the emerging plan, it is evident that the core purpose and objective of the above policy is to avert the amalgamation or joining of settlements and to protect the setting (i.e. location, scenery, background, siting and unique character) of existing settlements. The emerging policy seeks to achieve those objectives by identifying and defining Local Gaps, keeping those Local Gaps open; essentially keeping those identified area free from all forms of development; other than in certain circumstances when minor development *might* be permitted.

The evidence base<sup>9</sup> supporting emerging Policy 2 notes that the designation of Local Gaps at Bredon, as proposed within the emerging Neighbourhood Plan, is supported:

- by the Framework, through two of the twelve core land-use planning principles;
- by the SWDP and in particular Policy SWDP 2; and
- by the Parish Council's own devised test/criteria for assessing and identifying Local Gaps.

## **Assessment of emerging Policy 2: Local Gaps and Key Views**

### The Framework

The Framework sets out the Government's planning policies for England and how those policies are expected to be implemented. It replaced the previous regime of Planning Policy Statements and Planning Policy Guidance Notes.

The Framework makes it clear that its overarching objective is to encourage growth; making economic, environmental and social progress for this and future generations and delivering sustainable development without delay. Accordingly, it sets a 'pro-growth' agenda.

The origins of the Framework date back to the 'Open Source Planning Green Paper' released by the Conservative Party in 2010 to address the problems of the previous planning system which was said to have been "*broken*"; in that it was not delivering the social progress and economic growth that the country needs. The Framework was designed to facilitate positive growth. This is a critical point when assessing the 'soundness' of emerging plans.

The Ministerial foreword to the Framework defines the purpose of the planning system as being to help achieve sustainable development. It clarifies that:

*'Sustainable means ensuring that better lives for ourselves don't mean worse lives for future generations.'*

*Development means growth.*<sup>40</sup>

As highlighted within the emerging Bredon Parish Neighbourhood Plan, the Framework is underpinned by 12 core planning principles<sup>11</sup>. However, contrary to the note made within

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<sup>9</sup> Assessment of Local Gaps in Bredon Parish (March 2016)

<sup>10</sup> Ministerial Foreword, Page I; National Planning Policy Framework



paragraph 2.1 of the emerging Neighbourhood Plan's Assessment of Local Gaps at Bredon, none of those 12 core planning principles make any particular reference (direct or indirect) to the purpose of identifying Local Gaps through neighbourhood planning.

The emerging Neighbourhood Plan's Assessment of Local Gaps at Bredon specifically refers to core principles 1 and 5, as set out within the Framework. However, neither of those Core Principles provide any particular relevance or justification for the designation of Local Gap policies or the imposition of additional layers of planning control. On the contrary, Core Principle 5 sets out that planning should be '*supporting thriving rural communities*'. That's a positive process, not a negative or restrictive one.

Moreover, Core Principle 3 states that the planning system should proactively ***drive and support*** sustainable economic development to deliver business and thriving local places that the country needs. And, paragraph 14 of the Framework sets out, in very clear terms, that at the heart of the Framework there is a ***presumption in favour*** of sustainable development, which should be seen as a golden thread running through all plan-making. Again, a positive process, not a negative or restrictive one.

Additionally, Paragraphs 183-185 of the Framework are cited within the emerging Bredon Parish Neighbourhood Plan's Assessment of Local Gaps. Those paragraphs are cited as further justification for the proposed designation of Local Gaps. However, Paragraphs 183-185 of the Framework must be read in the context of the Framework's pro-growth agenda, the 12 Core Principles and the presumption in favour of sustainable development. Those Paragraphs provide no justification for designating Local Gaps. While they do set the Government's general support for Neighbourhood Planning those paragraphs are aimed at *delivering sustainable development* and *getting the right types of development*; securing development, not constraining economic growth or preventing social progress.

In considering the 'soundness' tests of emerging Neighbourhood Plan Policy 2, and the emerging designation Gap 5, it is important to note that the UK Government places particular emphasis on the planning system to support, not constrain, rural businesses and the rural economy. This is

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<sup>11</sup> Paragraph 17 of the Framework

evident at Chapter 3: Supporting a prosperous rural economy and Paragraph 55 of the Framework.

To recap, no aspect of the Framework supports, or even mentions, the principle of applying 'Local Gap' designations. There is absolutely no direction within the Framework for the introduction of such local policies and no encouragement for the application of additional levels of control within neighbourhood plans that go beyond that which are already in place within the strategic policies of an operative development plan.

#### South Worcestershire Development Plan (SWDP)

The SWDP 2006-2030 was adopted as recently as February 2016. It sets out how growth will be managed over the period to 2030 through a strategically driven growth agenda. As part of its adoption process it has been subject to extensive independent scrutiny and examination.

The SWDP contains 63 overarching policies which set a clear prescriptive vision of where, how and what type of development is acceptable in South Worcestershire. The plan specifically identifies, *inter alia*, development boundaries, development allocations and other key landscape and historical designations such as; Areas of Outstanding Natural Beauty (AONB), Green Belt, **Significant Gaps**, Conservation Areas, Scheduled Monuments, Historic Parks and Gardens, Flood Risk Areas, Minerals Safeguarding and Consultation Areas and Strategic Green Infrastructure Areas.

As part of the plan making process relating to the SWDP, the areas proposed by Bredon Parish Council as Local Gaps would have been assessed by the Strategic Planning Authorities, as part of the assessment undertaken to define Significant Gaps; but were not identified for specific protection beyond the planning controls set out within Policy SWDP 2<sup>12</sup>. That is a fundamental point because the matter of coalescence between settlements was – as part of the SWDP plan making process – an important factor that was given due weight and thorough consideration.

Planning Practice Guidance<sup>13</sup> outlines that in order for a Local Plan to be found sound '*appropriate and proportionate evidence is essential*'. It goes on to note that '*paragraph 158*

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<sup>12</sup> Development Strategy and Settlement Hierarchy

<sup>13</sup> Paragraph: 014 Reference ID: 12-014-20140306 of National Planning Practice Guidance

*onwards of the National Planning Policy Framework sets out the types of evidence that may be required'. Paragraph 158 of the Framework highlights that 'each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.'*

The reasoned justification for Significant Gaps is set out on page 50 (Paragraph 8) of the SWDP. It states that *'there are a number of Significant Gaps shown on the Policies Map. The purpose of maintaining these gaps, which either serve as a buffer or visual break between rural settlements and adjacent urban areas or protect the character and setting of settlements, is to provide additional protection to open land that may be subject to development pressures. The designation helps to maintain a clear separation between smaller settlements and urban areas in order to retain their individual identity. Acceptable development proposals in such areas may include the reuse of rural buildings, agricultural and forestry-related development, playing fields, other open land uses and minor extensions to existing dwellings.'*

Therefore it is logical, and reasonable, to conclude that in finding the SWDP sound, the Inspector looked at the evidence and agreed that it was adequate, up-to-date and relevant in relation to the economic, social and environmental characteristics and prospects of South Worcestershire (including the Parish of Bredon). At no point did the District Council or the Inspector find it necessary to statutorily adopt areas for the specific protection of open gaps at Bredon.

Thus, development proposals within the open countryside at Bredon must be considered under the provisions of Policy SWDP 2: Development Strategy and Settlement Hierarchy sets out the principles that justify where new development should be delivered within South Worcestershire. Importantly, it also make clear, through SWDP 2 (B), that windfall development proposals will be assessed in accordance with a specified settlement hierarchy, that focuses development on Worcester City, Main Towns, Other Towns, category 1, 2 and 3 Villages and Lower Level Villages. The aim being to **restrict development in the open countryside**. Indeed, that has been the approach successfully taken at Bredon since the introduction of the Planning Act in

1947, which has served the locality well and protected the locality from sporadic development that might otherwise have been harmful.

In fact, Policy SWDP 2 (C) stresses that *'the open countryside is defined as land beyond any development boundary. In the open countryside, development will be strictly controlled and will be limited to dwellings for rural workers (see policy SWDP 19), employment development in rural areas (see SWDP 12), rural exception sites (see SWDP 16), buildings for agriculture and forestry, replacement dwellings (see SWDP 18), house extensions, replacement buildings and renewable energy projects (see policy SWDP 27) and development specifically permitted by other SWDP policies.'* Policy SWDP 2 sets put a robust set of controls to protect the countryside, but which have proper regard to the social and economic needs of the rural areas in line with the provisions of the Framework.

In light of the above, it is clear that there is no policy justification to support the emerging Neighbourhood Plan's proposed 'Local Gap' policy. There is certainly no specific support within the SWDP for the introduction of Local Gap policies through neighbourhood planning. It is also clear that the land identified as falling within emerging Local Gap 5 currently falls within the open countryside, as defined by the SWDP, and as such that land is comprehensively and properly protected by Paragraphs 17, 28, 55 and 80 of the Framework alongside Policies SWDP 2, 10, 12 and 18 of the SWDP.

Emerging Policy 2: Local Gaps and Key Views blatantly undermines the provisions of the Framework and the provisions of the SWDP – which correctly balance the protecting and enhancing our natural environment with the meeting the social and economic needs of our countryside. It is contended that the emerging Local Gap designation at Bredon, and in particular Local Gap 5, is an unnecessary additional policy restriction which has no regard to the social and economic needs of the rural landscape.

#### The emerging Neighbourhood Plan's 4 test/criteria for assessing and identifying Local Gaps

Bredon Parish Council has set out a specific methodology in assessing the suitability of Local Gaps. To be considered suitable for designation land assessed must accord with Tests 1, 2, 3 ***and*** 4 to be considered suitable to be identified within the emerging Neighbourhood Plan as a

Local Gap. This representation does not seek to comment on the appropriateness of those tests, it merely seeks to assess whether our Clients' land interests have been properly assessed.

Test 1: Does any land in the proposed Local Gap already have planning permission, or has it been allocated in the SWDP?

The Assessment of Local Gaps in Bredon Parish sets out that Local Gaps should exclude land which is subject to an extant planning permission for development, or which has been allocated for development under the SWDP. An exception to this may be where it can be demonstrated that the Local Gap designation would be compatible with the planning permission / SWDP allocation, or where the planning permission / SWDP allocation is no longer capable of being implemented.

It is considered that proposed Local Gap 5 **meets** the criteria set out above as it the area it covers is not subject to an extant planning permission for development and/ or has it been allocated for development under the recently adopted SWDP.

Test 2: Is there an extensive area of undeveloped land between the settlements where the Local Gap is proposed?

The Assessment of Local Gaps in Bredon Parish states that a Local Gap designation will not be appropriate where an extensive area of undeveloped land separates settlements. Development at such locations would be unlikely to bring about settlement coalescence. The Parish Council's assessment guidance states that where more than 1000 metres of uninterrupted open land exists on both sides of a road linking two villages, the risks of coalescence are small. It also notes that consideration ought to be given as to whether the open land extends across both sides of the road, and the degree to which it has been fragmented by occasional dwellings, farm buildings and other development.

A quick assessment of emerging Local Gap 5 reveals that it does not meet the criteria set out above, as it is an extensive area of undeveloped land separating settlements. The Assessment of Local Gaps in Bredon Parish describes the area as '*chiefly consists of pasture, with an open character. Tewkesbury Road is lined with veteran hawthorn hedges. Extensive views through and under hawthorns across Avon vale. Large agricultural buildings at north and south ends.*'

Here it should be noted that the existing landscape, as accurately described above, is a product of the successes of previous policy regimes of a very similar nature to the extant provisions of Policy SWDP 2.

Any development permitted by Policy SWDP 2 within that area could not, by definition, bring about any settlement coalescence between Bredon's Hardwick and Tewkesbury (Mitton). Moreover, there is more than 1000 metres of uninterrupted open land exists on both sides of a road between the two settlements; in fact, the distance between Bredon's Hardwicke and Mitton is circa 1450 metres.

Therefore in line with the Parish Council's criteria, proposed Local Gap 5 **fails** to meet Test 2, as the distance between the two built up areas exceeds 1000 metres. Instead, reliance should be given to Policy SWDP 2 which will ensure there is little risk of coalescence.

Test 3: Does the area play a significant role in preventing coalescence between settlements, or does it enhance the individual character of the settlement?

The Assessment of Local Gaps in Bredon Parish states that an area could qualify for Local Gap designation if it played a significant role in separating two settlements that would otherwise be in danger of coalescing. It goes on to note that consideration should be given to the fact that large settlements exert a greater 'gravitational' effect on their hinterlands than small ones, both physically and psychologically. They may require larger buffers to prevent a sense of coalescence, even where a physical gap remains. An area could also qualify for designation if it made a significant contribution to the character of a settlement.

The area identified within the emerging proposed Local Gap 5 is under no 'gravitational' pressure and poses no threat to the coalescence of Bredon's Hardwicke and Mitton. That land, which is within the open countryside as defined within the adopted SWDP, plays no 'significant role' in preventing coalescence as it comprises a very large gap and there is no threat of that large gap closing due to extant protection afforded under the provisions of Policy SWDP2. With regard to any suggestion that the area makes any significant contribution to the character of a settlement, it is clear it is of no defined special character which would otherwise put it in a category different to other land in and around the existing settlements within the Parish. It cannot reasonably be argued as having qualities that enhance the setting of Bredon's Hardwicke or Mitton; it is simply

a fine rural landscape that has no distinctive qualities that sets it apart from other rural landscapes.

The Parish Council's Assessment of Local Gaps within Bredon Parish makes mention of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) by setting out Tewkesbury's strong influence over its hinterland and by extension Bredon's Hardwicke. However, the JCS has no jurisdiction over the administrative area which is covered by Wychavon District and Bredon Parish. The SWDP, on the other hand, does have such a jurisdiction and clearly sets out full and proper protection over areas where it is necessary to do so.

Therefore, in line with the Parish Council's set criteria, proposed emerging Local Gap 5 **fails** to meet Test 3. The land covered by the emerging gap policy is not in any identified danger of coalescing and a larger buffer, which prevents otherwise acceptable forms of development<sup>14</sup>, is unnecessary. The land covered by emerging Gap 5 does not play any defined contribution to the character of settlements and it does not comprise of any interests of acknowledged landscape importance in the setting of the settlements of Bredon's Hardwick and Mitton.

Test 4: Would new development have a detrimental impact on the area's role as a buffer between settlements, or on the character of any particular settlement?

The Parish Council's Assessment of Local Gaps in Bredon notes that for land to be designated as a Local Gap, it should be deemed that new development, such as dwellings or business premises, would exacerbate settlement coalescence, or would harm to the character of a settlement. Where little open space remains between settlements, it may be taken as read that new development will exacerbate coalescence. The document notes that account should be taken of how even low levels of development can bring about large changes in the way an area is experienced in certain contexts. For example, a single dwelling located in open land between settlements, is likely to result in a much greater loss of in rural character than one located immediately adjacent to a settlement. It goes on to state that account should be taken of the effects of developments associated with rural businesses such as large modern agricultural barns, holiday caravans and equine structures on settlement coalescence or loss of character. And, account should also be taken of the effects of incidental development such as gardens,

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<sup>14</sup> Limited development permitted under the provisions of Policy SWDP2.

lighting, vehicle splays and signage; for example, the planting of alien coniferous trees or shrubs around a new dwelling may have a powerfully sub-urbanising effect on a rural location.

It is evident that the above description of perceived 'harm' goes much further than meeting the objective of preventing coalescence or the objective enhancing the setting of a settlement; it seeks to prevent development for the sake of doing so.

As noted above, the land which is subject of the emerging Gap 5 designation is no different than other land set within the open countryside. Any proposed development, such as dwellings or business premises, would be considered in accordance with the provisions of the adopted development plan Policy SWDP 2. That policy is robust and guarantees a thorough assessment of any proposal in terms of its suitability, impact and potential harm. That policy is tried and tested; since - in one iteration or another - it has existed since the introduction of the Planning Act of 1947.

As noted above, there is currently significant open space between settlements and coalescence between those settlements is not a realistic threat. While it is agreed that even low levels of development - if not properly controlled - can bring about large changes, Policy 2: Local Gaps and Key Views and proposed Local Gap 5 presents an unnecessary level of restriction which is otherwise covered by the SWDP, which protects the open countryside from unsustainable development.

Thus, it is clear that using the Parish Council's own set criteria, proposed Local Gap 5 **fails** to meet Test 4. Additionally, there is no demonstrable evidence that the landscape contained within proposed Local Gap 5 is of such a significantly special character that controls need to be applied beyond those established under adopted development plan Policy SWDP2.

### **Summary and Conclusions**

This representation has set out a reasoned case as to why the Local Gaps Policy, and in particular emerging designation Gap 5, as proposed by emerging Bredon Parish Neighbourhood Plan are unnecessary and fail to meet the criterion set out by the Parish for assessing such matters.



Moreover, the additional level of planning control is unwarranted, unjustified and does not conform to the social and economic objectives of the operative development plan or the Framework; particular those objectives that seek to secure a prosperous rural economy.

In light of the above, it is requested that proposed Policy 2: Local Gaps and Key Views along with the emerging designation Gap 5, as illustrated within the Bredon Parish Neighbourhood Plan - Policies Map A, be deleted.

I would be grateful if you could acknowledge receipt of this representation. In the meantime, if I can be of any further assistance, please do not hesitate to contact me.

Yours sincerely,



Mark Chadwick MRTPI  
Senior Director  
Hunter Page Planning  
[mark.chadwick@hunterpage.net](mailto:mark.chadwick@hunterpage.net)

**From:** Alan Newell [REDACTED]  
**Sent:** 17 April 2016 14:43  
**To:** [Bredonpc@btconnect.com](mailto:Bredonpc@btconnect.com)  
**Subject:** Bredon Neighbourhood Plan

Mr A Newell  
[REDACTED]

Email: [REDACTED]

15 April 2016

Ms J Shields  
Bredon Parish Council  
Bredon Village Hall  
Main Road  
Bredon  
Tewkesbury  
GL20 7QN

Dear Ms Shields

**PRE-SUBMISSION CONSULTATION – BREDON NEIGHBOURHOOD PARISH  
NEIGHBOURHOOD PLAN 2016-2030 PRE-SUBMISSION DRAFT MARCH 2015**

I am a resident of Bredons Hardwick and the owner of Croft Farm Water Park. I am writing to object to aspects of the Neighbourhood Plan that is currently out for consultation. I am specifically concerned with the suggested constraints it seeks to impose on my privately owned land, Croft Farm Water Park. I would also like to point out at this stage that I have never been approached by the Parish Council (PC) to discuss its aspirations for my land. I consider that the PC has acted in a high handed and unreasonable manner in not having contacted me to discuss its proposals at an earlier date. The NPPG adds Guidance on "*Neighbourhood Planning*", paragraph 048 states that:

*"A qualifying body must consult any of the consultation bodies whose interests it considers may be affected by the draft Neighbourhood Plan".*

It goes on:

*"Other public bodies, landowners and the development industry should be involved in preparing a draft Neighbourhood Plan or Order".*

Clearly the PC has failed in this respect, notwithstanding the statement made at paragraph 4.4 of the 'Plan' that the PC "*are also seeking to involve key local stakeholders in the emerging plan*". Given the size of Croft Farm Leisure Park and also the associated commercial estate adjacent and the consequential employment generation from the sites, I am surprised and disappointed that no attempt has been made to involve me in the process.

Paragraph 8 (.2) of Schedule 4b sets out conditions which Neighbourhood Plans should meet. Amongst these is the requirement that it should be "*in general conformity with the*

*strategic policies in the development plan for the area". A further condition requires that it should have "regard to national policies and advice contained in guidance issued by the SOS". Paragraph 183 of the NPPF considers the role of Neighbourhood Plans and at Paragraph 184 states:*

*"The ambition of the neighbourhood plan should be aligned with the strategic needs and priorities of the wider local area neighbourhood plans must be in conformity with the strategic policies of the Local Plan... Neighbourhood Plans should reflect those policies and neighbourhoods should plan positively to support them. Neighbourhood Plans and Orders should not promote less development than set out in the Local Plan or undermine its strategic policies."*

The following extracts from the NPPF should guide the Neighbourhood Plan. I have underlined sections below of the Plan, which I consider to be relevant to my objections to the Plan. The NPPF makes clear that at its heart is the presumption in favour of sustainable development. This is a clear statement aimed at positively seeking "to meet the development needs of the area"

Paragraph 16 states inter alia that:

*"The application of the presumption will have implications for how communities engage in neighbourhood planning. Critically, it will mean that neighbourhoods should:*

- Develop plans that support the strategic development needs set out all in the Local Plans including policies for housing and economic development.*
- Plan positively to support local development shaping and directing development in their area that is outside the strategic demands of the Local Plan...."*

Paragraph 17 of the NPPF 'Core Principles', makes clear that planning should be 'genuinely plan led' and that neighbourhood plans should set out "a positive vision for the future of the area". It also identifies that planning should not simply be about scrutiny, but should be a "creative exercise in finding ways to enhance and improve the places in which people live their lives".

It states that planning should "proactively drive and support sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing and business and other development needs of an area, and respond positively to wider opportunities for growth..."

Paragraph 17 also states that planning should "promote mixed use development and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage or food productions)."

I have referred to the paragraphs above, as it is my considered view that the Pre-submission Neighbourhood Plan, as currently prepared, has not had sufficient regard to the relevant statements set out in the NPPF as subsequently updated in the NPPG.

My fundamental concern with the Plan in its current form is that it does not seek to proactively encourage business and employment opportunities in the area. Para 5.2 under the heading objectives states as a key objective: "To maintain and encourage employment opportunities within the parish encompassing all age groups and a range of skills" Whilst this is laudable

there is no indication that the Council is seeking to pro-actively encourage either new or existing businesses to locate or expand within the area. .

Question 41 of the survey undertaken by the PC asked *"what type of business development would you think would be best suited to the parish?"* The business is the area to be limited to *"small-scale", leisure and tourism related business such as B&Bs, village shops, cafés and small commercial units"*. Frankly, if further shops, B&Bs and Cafés do/could survive in the area, (to serve the local population) they would already be doing so. Without a larger population, the level of local services will not improve.

Question 41 of the survey includes reference to large scale leisure and tourism businesses, such as caravan parks. As I have made clear, I operate such a business at Croft Farm. It, together with the farm business park creates a significant number of local jobs in the area. In fact, we are probably the largest local employer in the area. The response to Question 3A was negative in respect of such businesses, notwithstanding the jobs provided and also importantly the income it brings to other businesses in the area such as pubs and shops. The value of tourism to the vitality and sustainability of local businesses should not be underestimated.

In employment terms, it is quite clear that 65% of local working people commute out of the parish to work because of the lack of local business opportunities. Paragraph 5.37 of the Plan *"seeks to retain and support local economic development, either at existing sites, or on new sites"*. Policy 12 'Local Employment' also enables the *"expansion of existing shops and businesses provided they conform to other policies of the Plan"*. Paragraph 5.36 sets out the main sources of employment in the village of which *"Croft Farm Waterpark"* is one.

However, nowhere in the Plan is there specific mention of the detail of adopted Policy SWDP 12 'Employment in Rural Areas'. This Policy (sub-section B) seeks to protect existing employment sites, even in the open countryside and specifically refers, inter alia, to *"tourism, leisure and/or recreation-related purposes..."*

The Plan also makes no reference to the value of tourism, touched upon above. Adopted Policy SWDP 'Tourism Development' is supportive of *"proposals for the expansion and development of the tourism potential of South Worcestershire..."* Under the section entitled 'Reasoned Justification', it is made quite clear how heavily South Worcestershire relies on tourism and leisure, *"it is an important element within the overall economy of the area..."*. Paragraph 3 states that *"within the rural context, the framework requires local authorities to support sustainable tourism and leisure developments that benefit rural businesses and communities."*

It is very disappointing that the Plan does not acknowledge the value of such business to the Plan, in terms of its input into the local economy and indeed employment.

Also ignored by the 'Plan' is Policy SWDP36 'Static and Touring Caravans, Chalets and Camping Sites'. This policy is permissive of *"proposals for new sites and proposed extensions or improvements to existing static and caravan, chalet (including log cabins) and camping sites..."* The 'Reasoned Justification' at part 1 is particularly apposite:

*"Caravanning and camping sites are popular leisure destinations and they provide flexible tourist accommodation and mobile holidays at a relatively moderate cost. They can be of great benefit to the local economy. As most types of caravan/camping holidays are self-catering, local shops, pubs and restaurants will benefit from the additional trade such visitors generate. Large numbers of visitors can also contribute greatly to the success of local attractions and other local businesses"*.

The detail of these policies of the adopted Local Plan should be incorporated in the policies of the Parish Plan, which should acknowledge and adopt a positive approach to tourism facilities in the area.

### **Local Green Space Site LGS 9**

Policy SWDP 38 of the SWDLP is concerned with Green Space. These spaces are defined on the adopted Proposals Map and the policy sets out a presumption against development on such sites. The policy makes it clear that additional green space can be secured under a range of proposed developments. These include proposals set out under SWDP Policies 5, 22, 29 and 39. These policies are concerned with the future provision of green space associated with Housing Development; Biodiversity and Geodiversity, SUDS and Community Space in New Development.

The adopted SWDP Policies Map shows a number of sites throughout the area that have been assessed as being of value as Local Green Spaces. In the parish area there are very few and none in the vicinity of Croft Farm. The test for the designation of such spaces is set out in paragraph 4 of the SWDP 38

*“These small local spaces are often valued and used heavily by local communities and are therefore worthy of policy protection. Whilst most green spaces are publicly accessible, some are in private ownership, although they nonetheless perform valuable functions such as contributing to biodiversity, the character of the area and providing a sense of openness and space.”*

Policies Map B of the Neighbourhood Plan identifies a number of Local Green Spaces around the parish. This is enabled by S76 of the NPPF and expanded upon in the NPPG. However, the NPPG makes it clear that “Blanket designations of open countryside adjacent to settlements will not be allowed” The Parish Plan has had regard to this and many of the earlier proposed Green Spaces particularly around the edges of Bredon have now been removed. However, the NPPG goes on: In particular designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name” (ID:37-020-20140306).

Whilst the Plan has been amended in some respects, the land at the entrance to Croft Farm Water Park, which is in my ownership, has been retained as Site LGS9. The site forms an integral part of Croft Farm Water Park and abuts my dwelling, Croft Farm House. The main access to the park runs through this land, which is screened by hedgerows and verge trees. Beyond it is yet further open land. Quite why it has been singled out in terms of the Parish Plan is entirely unclear, the land is privately owned and its use is specifically related to the authorised business on the site. It has no ecological interest nor is it open to wider public access, there are no public footpaths crossing the site. In terms of the character of the area it is quite clearly a functional part of the business.

The Assessment of the value of the site set out in the Council document ‘Assessment of Local Green Space in Bredon Parish’ is lengthy however its commentary does not appear to accord with para 77 of the NPPF which clearly states the criteria that should be considered for designation. In this regard, the location of the site is on the edge of Bredons Hardwick it is not a site that directly serves either the immediate community or the wider area of the Parish.

There is no reason why the area of land designated should be considered to be “demonstrably special to the local community, it is an area that is screened from passers-by with landscaping. It is not a particularly attractive area of landscape being part of an area of gravel workings. It certainly has no particular beauty, no historic significance, and no public recreational value. As a consequence of the Water Park business it is not tranquil nor has it any special wildlife quality. To attempt to justify the designation on these grounds is wholly unreasonable and

unjustified. The fact that local people may pass the site on a daily basis does not make the site a valued local asset and neither does the fact that it is one end of the village. The argument “against the extension of the village at this location would result in linear, ribbon development along the main road” as set out in the Parish assessment would be equally relevant to any ‘first’ or ‘last’ development in any settlement development. Indeed it appears by reference to the ‘Local Gaps’ designations also proposed by the Council, that it is conflating the purpose of the two separate designations. Accordingly I do not consider that the designation of the land as a Local Green Space meets the tests for the designation as set of in the NPPF/NPPG.

I can only assume that the purpose of including this entirely random and unjustified small area of land as Green Space represents an unwarranted interference on my land. The Parish Council has recently opposed a planning application on the site for a small dwelling to be constructed as a Managers house connected to the operation of Croft Farm. I consider this latest proposed designation is yet a further attempt to prevent appropriate development on the site and to interfere with my business. This is a misuse of the Neighbourhood Plan process. My business is a valuable local employer and I will strongly resist any attempts by the PC to seek to control my land by this back door method.



#### **Local Gaps Site GAP4**

The SWLDP defines Significant Gaps on the Proposals Maps. These Gaps are clearly designed to prevent the coalescence of the larger towns in the district, where the majority of development is to be located. In this regard, they must be considered to be strategic. The Neighbourhood Plan, Policies Map A, identified a number of ‘Local Gaps’ which it states are required to prevent coalescence between a number of settlements in the h areas, in order to protect their distinctive individual character and setting.

Whilst there is some logic in seeking to prevent coalescence of demonstrably small gaps between settlements within an area, such as (arguably) that between Bredon and Westmancote (Gap 2), there is little point in the other Gaps identified on the Plan. Specifically, the scale of the identified Gaps 3, 4 and 5, which cover large tracts of open land, appears to be excessive and serve no real purpose. Development of any scale on these areas is restrained by the policies of the Local Plan and this further level of control is entirely unnecessary.

Certainly, Gap 5, in which my land is located, covers an area including my site all the way along the Tewkesbury Road to the edge of Tewkesbury to the south west. This is a very large tract of land and would require a large scale of development to fill the Gap that has been identified. As a consequence, it is entirely unnecessary and inappropriate to identify the land

as a potential gap. It is notable that under Test 4 of the Parish assessment of this Gap, the following statement is added "...even limited development such as agricultural buildings, holiday caravans or equestrian structures would cause unacceptable harm". It is quite unwarranted that the PC should seek to prevent appropriate development in this area by the 'back door' method by designating it as a Gap.

I trust the foregoing is helpful to you and I look forward to seeing a revision of the Neighbourhood Plan, which more appropriately meets the needs of the PC's area whilst reflecting the thrust and detail of the approved SWDP and the NPPF.

I am sending my comments through at 14.43 on 17 April as this is within the consultation time period.

Could you please send confirmation that you have received my comments.

Yours sincerely

A Newell

**From:** Martin Newell [REDACTED]  
**Sent:** 05 May 2016 00:20  
**To:** Bredon Parish Clerk  
**Subject:** Croft Farm

Dear Mrs Shields,

I would like to amend my letter dated 17th April 2016 with the below.

Regards  
Martin Newell

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17/4/16

Dear Ms Shields

I am writing to generally oppose the plan to designate part of my land at Croft Farm Water Park as a Local Green Space.

Croft Farm Water Park is described by the Parish Council as a "thriving local business", it is also one of the larger employers in the Parish and contributes significantly to the economy in terms of local taxation. The Water Park attracts visitors both locally and from further afield as it develops into a destination resort. I consider that the landowner should be in control of his own land and what development should take place at Croft Farm Water Park subject of course to the necessary planning permission.

The attempt by the Parish Council to impose conditions on privately owned land is most unwelcome and is clearly a deliberate ploy to control further development particularly in light a recent application for a manager's house. I understand that consultation should have taken place prior to the land being designated as Local Green Space, but this consultation was not undertaken. I further understand that the proposed Local Green Space fails to meet all three tests that are required by the National Policy Planning Framework.

I see no benefit to the local community to designate part of Croft Farm as a Local Green Space, the land is in private ownership and general unpaid public access is not allowed, there are no public footpaths across the land which is in fact well screened from the Bredon Road and therefore offers no significant views.

Looking at the general plan of the BNP it is clear that the Parish Council have picked on any land with previous planning history and slapped a proposal for a "Local Green Space" in an attempt to put further hurdles in the way of housing development. The Parish council are fully aware that part of this land has been subjected to a planning application for a manager's house. This application is considered vital to the future development and management of an important local business. I currently live with my family in Tewkesbury but it is our ambition to move back to the hamlet, where I grew up and live on Croft Farm property. As management this will also enable us to have an immediate response to any situations at the park.

I would be grateful if you could acknowledge receipt of this email.

Regards  
Martin Newell  
General Manager  
Croft Farm Water Park



From: Mike Pullin [REDACTED]  
Sent: 14 April 2016 14:57  
Cc: [bredonpc@btconnect.com](mailto:bredonpc@btconnect.com)  
Subject: Bredon neighbourhood plan pre-submission consultation

Dear Ms Shields

I am writing to oppose the pre-submission consultation for Bredon village.

As a landowner whose land will be effected by this plan for land designated as green space and local gap. I am surprised and disappointed that I received no formal notification of the plans. I believe this is not following the national planning policy.

I believe that Bredon will need more houses in the future for the younger generation As at present there are few houses available at low cost for them. This would also keep The local schools open and a sub sustainable village shop.

It has been suggested by the parish council that 100 houses be built as in-fill. Quite where this in-fill is going to be I cannot imagine.

I therefore suggest this plan is re thought

Mr M Pullin

From: Mike Pullin [REDACTED]  
Sent: 14 April 2016 15:32  
To: [bredonpc@btconnect.com](mailto:bredonpc@btconnect.com)  
Subject: Pre submission plan Bredon

Dear Ms Shields

I write to oppose the Bredon neighbourhood plan pre-submission consultation.

As a local landowner I received no notice of this plan for green space and local gap areas. Surely this is against national planning policies?

Bredon will need houses in the future for the younger generation to ensure a mixture of Age groups in the village and to guarantee the future of the school and local shop. At present there are not enough low cost houses for the local youth and some reserve areas need to be kept for this purpose.

It has been suggested by the parish council that 100 houses be built in the village as In fill, this is not a viable option as the area needed is just not there.

Therefore I oppose this plan and suggest it is re thought and local landowners kept Informed rather than in the dark about decisions that greatly effect their property.

Mrs P Pullin



14 April 2016

Mrs J Shields  
Clerk Bredon Parish Council  
Bredon Village Hall  
Main Road  
Bredon  
Tewkesbury  
GL20 7QN

My name is Brian Walker and I am one of the owners of land off Cheltenham Road, Bredon which is locally known as Bensham Allotments. Back in May 2013 we submitted an outline planning application for 33 houses which included 13 affordable homes (Wychavon Reference W/13/01150/OU) This land falls within the boundary of LGS7 of the Neighbourhood Plan that the Parish Council are seeking to identify as Local Green Space.

As an interested party I would like to make the following points related to the Bredon Parish Neighbourhood Plan:

My son played rugby for a number of years for Bredon but has only recently been able to buy a property in Bredon. Many of his friends have not been so lucky and have not been able to afford to buy within the Parish and have reluctantly had to move away. Addressing the chronic lack of affordable housing should be looked as a matter of urgency. I would like to know<sup>how</sup> many of the 100 or so houses delivered through recently built or approved schemes were allocated to affordable housing and reassurance future developments include the proposed target of 40% affordable housing which should be prioritised for people with a local connection.

With regard to the views when entering Bredon from Kinsham on the

Cheltenham Road, much is made of the beautiful views of traditional orchards, hedges and other natural heritage sites. This not the case. The first thing you actually see is a farm silage pit which when filled is also covered with 100s of tyres.

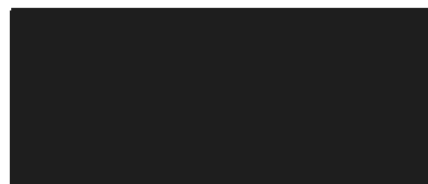
In a similar vein the views from Bensham are advertised as being able to see Bredon Church and views to Kinsham. Neither of these can be seen from Bensham Allotments.

Also "Neighbourhood plans must show that Parish Councils or Neighbourhood Forums have properly consulted local people." Only 237 responses seems a very low percentage of the population of Bredon. Similarly at a meeting called to discuss the Neighbourhood Plan, there was a very small turnout.

I would like to remind Wychavon Council of our plan for the 33 houses, including 13 identified as affordable which when the government ask for the provision of additional housing within the District to meet additional quotas which could be re-examined at very short notice. I notice with interest that the 28 houses of Orchard Close extension came up against similar opposition from the Parish Council. As can be clearly seen despite this opposition these houses have integrated seamlessly into the fabric of the village, indeed they form almost a half of the figure for Projected windfall development in Bredon village 2007-2015.

The development of Bensham Allotments would similarly help alleviate the shortage of affordable local housing and go a long way to making up the required number of houses required under the Forecast for Development for 2016-2030 (which is based on the 2007-2015 figures)

Yours sincerely  
Brian Walker



Ms Jacqueline Shields  
The Clerk  
Bredon Parish Council  
Bredon Village Hall  
Main Road  
Bredon  
Tewkesbury  
GL20 7QN

HJ/JH/3923/eds  
14<sup>th</sup> April 2016

**SENT ELECTRONICALLY**

Dear Ms Shield

**RE: REPRESENTATIONS ON THE BREDON PARISH NEIGHBOURHOOD PLAN PRE-SUBMISSION DRAFT**

This letter has been prepared by Hunter Page Planning on behalf of Mr Richard Washbourne, the owner of land west of Moreton Lane, Bredon, who wishes to make the following comments on the pre-submission draft of the Bredon Parish Local Plan. The comments are made as per paragraph 47 (reference ID: 41-047-20140306) of the National Planning Practice Guidance (NPPG) note titled 'Neighbourhood Planning'.

This representation focuses on the Local Green Space designations within the Plan, in particular the designation of Mr Washbourne's land (allocation ref. GS3).

**Site Context**

The land within our client's ownership is located beyond the northern edge of Bredon and comprises agricultural land with electricity pylons running north-south through the western section of the site and a telephone mast at the southern end of the site. It is bound by Moreton Lane (B4080) to the east, a railway line to the west, woodland to the south and a track (which also comprises public right of way ref. 517(B)) to the north. Views into the site are restricted to the public right of way, with views from Moreton Lane screened by a strong tree line and hedgerow along the site's eastern boundary.

The site is an orchard; however the vast majority of the trees with historic value have died by now, with only 5 remaining. Our client has replanted 81 new trees on site since 2010/11.

The site is not subject of any landscape or heritage designations, nor is it at risk of flooding, however the trees on site are protected by a Tree Preservation Order (TPO). It lies outside the development boundary of Bredon and therefore constitutes open countryside, as defined by the South Worcestershire Development Plan.

**Considerations**

Within its justification for designating the above site as a Local Green Space (which can be found at page 7 of the 'Assessment of Local Green Space in Bredon Parish' document, which supports the Neighbourhood Plan), the Bredon Parish Council Steering Group references the historic significance of the traditional orchard on the



site. However, as established above, the vast majority of the historic trees on site have now died and been replaced with trees planted in the last 6 years. Furthermore, two other Local Green Space designations within the Plan (refs. LGS5 and LGS7) are also traditional orchards, illustrating that this landscape feature is fairly common within the Parish. No justification has been provided as to why this site is particularly special to the community in comparison to the other two, and is not physically linked to other orchards within the Parish. As such, historic significance is not a valid reason to support the designation of the site as a Local Green Space.

The list of tests set out at page 4 of the Assessment of Local Green Spaces Document highlights that where a site is already protected by a designation, consideration should be given as to any additional benefit would result from designation as Local Green Space. The trees on site are covered by a TPO which prohibits the cutting down, topping, lopping, uprooting, wilful damage, and wilful destruction of trees without the local planning authority's written consent. As such, the orchard is already protected, negating the need for further protection as a Local Green Space.

As part of its justification of the site's designation within the 'Assessment of Local Green Space in Bredon Parish' document the Steering Group also claims that the site provides an attractive backdrop to the entrance into the Village, which is experienced daily by many residents. Based on the site context section above, this statement is inaccurate as views into the site from Moreton Lane (the entrance into the Village) are heavily screened by vegetation along the eastern boundary. Furthermore, views from the playing fields are also screened. By virtue of this, visual amenity and beauty are not justification for designating the site as a Local Green Space.

The site's wildlife richness is another reason given by the Steering Group for the designation of the site as a Local Green Space. On page 4 of the Assessment of Local Green Space document it states that a site's wildlife richness must be demonstrated. Within the justification for the designation of the site there is no reference to any particular survey undertaken to assess the wildlife value of the site. As such, there is no evidence to demonstrate that the site is rich in wildlife.

It is clear that the site has no recreational value as it is private land and the location of the adjacent railway line indicates that the site is not tranquil. By virtue of this, and the above, it is evident that the site does not meet these criteria.

In line with the above, it is considered that the reasons given for historic significance and beauty are not justified. In this context, it is considered that the tests outlined at paragraph 77 of the National Planning Policy Framework have not been met as the site has not been proven as demonstrably special to the local community.

Further to this, paragraph 19 (ref ID: 37-019-20140306) of the planning practice guidance note 'Open space, sports and recreation facilities, public rights of way and local green space' states the qualifying body '*should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space*'. Bredon Parish Neighbourhood Plan Group (the qualifying body of the Bredon Parish Neighbourhood Plan) has not contacted our client to discuss the designation of his land as a Local Green Space. It is therefore concluded that Bredon Parish Steering Group has acted contrary to planning practice guidance by not discussing designations with the relevant landowners.

## Conclusion

This representation demonstrates that land west of Moreton Lane (allocation ref. LGS3) does not meet the requirements set out within paragraph 77 of the National Planning Policy Framework for the designation of a Local Green Space. Furthermore, the Bredon Parish Neighbourhood Plan Steering Group has acted contrary to good practice set out within planning practice guidance by failing to consult with landowners prior to designating their land.

In light of the above it is respectfully requested that the Local Green Space designation of land west of Moreton Lane is removed.

I trust that the conclusions made within this letter will be given due consideration in the progression of the Bredon Parish Neighbourhood Plan. Should you have any queries please don't hesitate to contact me.

Yours Sincerely



Hywel James

**Hunter Page Planning**

[hywel.james@hunterpage.net](mailto:hywel.james@hunterpage.net)