

Response by Kemerton Parish Council to NPPF consultation

Introduction.

Kemerton is a small rural parish in the Wychavon district of Worcestershire and borders the Tewkesbury Borough district of Gloucestershire on its southern edge. Nearly all its built development lies within the Cotswolds National Landscape. It should be noted that, for the production of the local plan covering Kemerton, the three South Worcestershire Councils (SWC) of Malvern Hills District, Worcester City and Wychavon District act jointly.

The parish council does not feel competent to respond to the majority of the questions posed in the consultation and is limiting its response to the following.

Question 1. We understand why the government considers that the present policy may cause delay, but we do not consider that the proposed revision of the standard method would take proper account of the actual circumstances of Kemerton and Wychavon. In particular, it does not take account of areas such as the SWCs which have had a high rate of housing delivery in recent years. Therefore we cannot support reversal of the December 2023 changes to paragraph 61, since this implies that the new Standard Method becomes mandatory.

Question 2. No, see above.

Question 3. We support the change to the NPPF which will promote higher density in urban areas. However we are told by Wychavon DC that the removal of the urban uplift has raised the housing requirement for many suburban and rural local authorities and, in particular, that of the SWCs by 80%. Therefore we cannot support the removal of the urban uplift as presently formulated.

Question 4. We support the changes proposed in paragraphs 11 and 12 of the consultation document.

Question 5. We support amendments to the presumption of sustainable development so long as the development is truly sustainable.

Question 7. However we are concerned that it is proposed to reverse two changes made in 2023 (i) that an authority which had a recently adopted plan would not have to demonstrate a 5YHLS for five years and (ii) that local authorities which are at an advanced stage of plan need only to demonstrate a 4 year housing land supply. We fear that removing these changes would undermine plan-led development.

Question 8. No in so far as it relates to the answer to question 7 above.

Question 15. A crude percentage increase in the annual housing stock is not necessarily an improvement on household projections. We consider that there is a need for all areas to grow but consider that urban and peri-urban areas should grow more than rural ones. It should be borne in mind that the growth in population over the last twenty years has been largely the result of net immigration and that most of these migrants have been attracted to large conurbations. A crude .8% increase on Wychavon's housing stock of 61,384 dwellings would give 491 units per year which nearly equates to the currently assessed need of 486, without making any allowance for affordability -see below.

Question 16. Yes, if there is to be an affordability criterion.

Question 17. No. It is given too much weight, unless the percentage baseline increase is substantially reduced – see Question 15 above. We have already said that we object to the removal of the urban uplift – see Question 3 above.

Question 18. Yes, but we do not regard ourselves as competent to suggest a method.

It should be noted that the application of all the elements of the New Standard Method to Wychavon would result in a rise in the housing need requirement for Wychavon from 486 dwellings per annum to 959. Kemerton Parish Council would find such an increase unacceptable.

Question 22. The Vale of Evesham in Wychavon is known as a major horticultural area. It consequently has a number of apparently redundant glasshouses situated on high grade agricultural land. Where planning consents were for horticultural/agricultural use these should not be considered as PDL but should be maintained in horticultural use restored to agriculture.

We have no comments to make on Green Belt/Grey Belt issues as they do not affect Kemerton directly.

Question 47. We support the provision of homes for Social Rent.

Question 48. We agree with this.

Question 49. We agree with this.

Question 51. We agree with this.

Question 53. As a small village we would support small developments of mixed tenure.

Question 54. Where mixed tenure developments are not regarded as viable the local Housing Associations should be encouraged to provide small developments for Social Rent.

Question 58. This does not seem to be a problem in our locality.

Question 59. We agree with the removal of ‘beauty’ and ‘beautiful’. We would like our (South Worcestershire) Local Plan to give weight to Local Information Sources such as the Kemerton Village Design Statement.

Question 67. We agree with this.

Question 69. We do not support the change to paragraph 115 if ‘all tested scenarios’ means that objectors have to provide expensive modelling in cases where direct observation has shown there to be a problem. Currently there are problems with the A46/M5 interchange when a blocking of the motorway results in diversion of traffic along the minor road through the villages in the Cotswold National Landscape on the south side of Bredon Hill. Planning officers have refused to accept that additional development generating traffic at this junction will produce similar results. **We consider that the NPPF should make it absolutely clear that satisfactory traffic infrastructure is in place before development occurs.**

Question 82. We do not agree with this. Best and most versatile agricultural land should continue to be protected and this addition underlines the point.