



South Worcestershire Development Plan

Response from Transition Evesham Vale (TEV)

Introduction

This response has been prepared by members of Transition Evesham Vale. It represents the consensus view held by members of TEV, though individual members may also have responded with their own specific feedback.

TEV is a community group, initiated in 2009 to consider practical ways to respond locally to the challenges of climate change and rising energy prices as a consequence of growing demand and limited supplies of cheap fuel. Please see our website at www.transitioneveshamvale.org.uk

Given our purposes we welcome the fact that the Government is placing localism at the heart of the planning system. Strong local engagement and control over development decisions is to be welcomed. But it should also be recognised that there are some issues which will require consideration over a wider area than that of an individual local authority if appropriate decisions are to be made. The potential impacts of some development may extend over an area far greater than that of a local planning authority. Specific examples in the Vale of Evesham are developments which increase movements of heavy goods vehicles and developments which increase disproportionately commuting to other parts of the West Midlands.

Summary of response

- While there is much in this plan that we can and will support, we feel that a number of positive and practical opportunities are missed.
- The plan presents a comprehensive view from the *Planners'* perspective, but in facing the tough environmental and economic challenges ahead we believe it needs to consider more from the *Planet's* perspective
- There is limited evidence of the environmental impacts and costs of the proposed plan
- Much of the plan is based on an assumption that economic growth is inevitable. There is increasing evidence that this is not the case, and that we should plan our futures on the basis of prosperity without growth.
- Is economic growth desirable and equitable, let alone inevitable? Would quality of life, environment and wellbeing be better aims for the plan?
- SWDP26 – design is particularly disappointing, as it appears to totally ignore any consideration of sustainable design
- It is not clear how local approval for planned developments will be measured or demonstrated? Will it involve a form of community referendum?
- Will applications for major development be subject to independent assessment? Will this be paid for by the applicants?
- The consultation document does not make sufficient reference to the importance of national, regional and cross-boundary issues which impact on South Worcestershire.
- It is not clear what incentives exist for local authorities to work together

To conclude...

- The South Worcestershire Development Plan provides a great opportunity to establish a more sustainable, and 21st Century pattern of local community-based living and working.
- We must ensure that this plan has the vision and ambition to secure long term prosperity, quality of life for all, and a low carbon economy for South Worcestershire – which should be the overall aim of this plan!

Detailed response

Page	Paragraph	Support Oppose Comment	Response
6	Foreword	Comment	Should purely economic prosperity lead the planning strategy? We believe that the stated aim of this plan should be to 'secure long term prosperity, quality of life for all, and a low carbon economy' (as suggested later in paragraph 27.3 of the plan)
7	Foreword	Support	We have reduced the number of urban extensions on greenfield sites
14	2.5	Support	The character of the natural landscape of S. Worcestershire to be protected and enhanced
15	2.8	Support	The plan correctly acknowledges the need for flexible transport and safer routes for pedestrians and cyclists
17	2.14 Table 1	Comment	<p>Population and Housing</p> <p>Single occupancy is enormously wasteful of current housing stock. Should we assume this is inevitable, or should we plan to encourage a change in behaviour towards more efficient use of existing housing stock, infrastructure and utilities? Should the plan not act to encourage communities to make better use of existing dwellings through either cohabitation, or subdivision of existing buildings. Ownership of second homes in villages should be dis-incentivised through council tax. How many 'empty' dwellings are there that could be put back into use?</p> <p>The following excerpt provides some contextual evidence:</p> <p><i>There are now over 25 million empty bedrooms in under-occupied homes in England – rooms that are surplus to need based on the English Housing Standard. Very many of these are in the homes of the retired, and by 2026 empty bedrooms in the homes of the retired will exceed 10 million. The British 'family home' is increasingly not owned by families, but by older, post-reproductive couples and single people.</i></p> <p>Hoarding of Housing: The intergenerational crisis in the housing market by Matt Grifoith for IF.org.uk</p>
17	2.14 Table 1	Comment	<p>Employment and Jobs</p> <p>Is the market demand from local people needing housing, or property developers needing to expand their business?</p>
18	2.14 Table 1	Comment	<p>Land use in South Worcestershire</p> <p>The emphasis should be placed on using land and buildings to support local jobs, but should not be based on an assumption of growth in GDP. We need specific emphasis on jobs which support the local economy and increase local resilience.</p>

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18	2.14 Table 1	Comment	Retail There is a major point missed here. The plan should target and enable a shift back towards more local and more specialist retail providers selling local products and produce. This will reduce the colossal logistic and carbon costs of the current retail model. The switch in buying habits towards internet shopping may also result in reduced need for high street retail space. Vacated shops and offices could be converted back to residential use, recreating vibrant town centre communities. (E.g. Cowl St, Evesham)
18	2.14 Table 1	Comment	Tourism The estimates of future provision of hotel and holiday accommodation appear to omit consideration of the proposed lodge development at Evesham Country Park
20	2.15	Comment	In the first bullet, rather than economic prosperity as the priority outcome, we would prefer the broader priority of <i>'Securing long term prosperity, quality of life for all, and a low carbon economy'</i> as referenced in paragraph 27.3
20	2.15	Support	Sustainable development which respects the environmental qualities and capacity of South Worcestershire
24	3.1	Comment	We propose an additional bullet point, as follows: Building a sustainable and resilient low carbon future for South Worcestershire
25	Vision	Comment	We propose an extension to this Vision statement, as follows: Para 3...farming and horticulture to continue to play an important role in the local economy, <i>and strengthened local supply of food and other resources.</i> We propose an additional vision paragraph, as follows: <i>A transport infrastructure which enables safe and sustainable movement using low carbon forms of transport, including cycling, walking and mobility.</i>
26	3.6	Support	Priority 4 – to prioritise the redevelopment of brownfield sites within urban areas to aid the regeneration of city/town centres
27	3.6	Support	Stronger communities – objective 4 – to allocate most development in locations with good access to local services and where transport choice is maximised
27	3.6	Support	We strongly support all the objectives in 'A better environment for today and tomorrow'.
29-30	4.2 – 2, 3, 5, 6, 9, 10, 12	Support	We support these principles as referenced
31	4.3	Object	In view of our comments relating to 2.14 – Population and Housing, we would challenge the need for this quantity of new housing, when much better use could be made of existing housing stock
32	4.7	Support	Prevention of urban sprawl
36	SWDP1	Support	We support the principles outlined on P36

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44	4.29	Support	Unlike central government's proposed revision to local planning regulations, the definition of 'Sustainable Development' is spelt out in detail in SWDP3.
44-45	SWDP3	Support Comment	We welcome the commitment to Code 6 and BREEAM 'excellent'. However, we would urge you to go further, following the examples of planning authorities both in UK (Camden) and overseas (Sweden) to adopt the Passivhaus standard for all new properties e.g London Borough of Camden, who in their Local Development Framework ' <i>strongly encourage schemes to meet the Passivhaus standard.</i> ' Councils should also ensure that developments that have already received approval are built according to the current standards rather than those in force when planning permission was granted.
46	4.34	Object	Rejection of this option suggests that commercial influences are considered a higher priority than the long term sustainability and resilience of our communities and the planet.
47	4.36	Support	We are pleased to see recognition that demand responsive forms of public and community based transport such as community buses will be needed. Also support the aim to improve transport choice to enhance rural accessibility.
48	4.39	Comment	While it is good to see recognition of the need for improvements to walking, cycling and public transport facilities, there is a need for more rigorous enforcement of this with developers, as there is little evidence that money previously set aside under section 106 agreements has been used to improve cycling and pedestrian infrastructure.
48	4.40	Support	Focus new development to minimise transport movements
49	LTP3	Comment	TEV gave comprehensive feedback to the LTP3 consultation, and was pleased to see evidence that some of our feedback had been considered in the final plan.
50	4.48	Support	TEV supports the proposal to develop Worcestershire Parkway station

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53-55	SWDP4	Object	<p>While addressing many of the needs for transport in the area, we believe this section misses a number of key opportunities:</p> <ul style="list-style-type: none"> • There is no recognition of the need to reduce the massive carbon emissions from heavy goods vehicles, which lead to a very high per capita carbon footprint for residents of Wychavon • There is potential for the provision of rail freight hubs to take freight off the road e.g. at Honeybourne • Re-open rail link between Cheltenham, Honeybourne and Birmingham to reduce commuting traffic in the Vale of Evesham • No mention is made of provision of infrastructure for low carbon transport such as electric vehicles • No mention is made of the need to reduce vehicle ownership, incentivised by encouraging developments without garages but with cycle storage.
56	4.5 SWDP5	Comment	The plan recognises the value of green infrastructure, but could say more about how this contributes to 'quality of life for all' and the wellbeing of the planet and its people.
59	SWDP5	Support	We support the aim to reduce the fragmentation of habitats to protect biodiversity
95	7.2	Object	Whilst there may be frequent buses from Evesham to Cheltenham, the journey time is excessive
95	7.3	Support	We support recognition of the importance of the conservation area
97	7.1.1 SWDP11	Support	<p>We are pleased to support the following proposals within SWDP11</p> <ul style="list-style-type: none"> • Use of brownfield sites for development • Improved parking provision at Evesham Railway Station • New pedestrian /cycle bridge connecting Hampton with Evesham Town Centre • Existing open space will be protected and enhanced
97	SWDP11	Object	No mention is made of the pedestrian and cycle bridge from Bengeworth Marina to Common Rd, Evesham, as detailed in LTP3. This is particularly necessary in the light of the proposed development on Offenham Rd, and the poor air quality in Port St.
97	SWDP11	Object	We are disappointed that there are no proposals for an integrated approach to sustainable transport within Evesham with a network of cycle routes and pedestrian walkways to reduce the need for travel by car. (Evesham Vale Cycle Forum are preparing a proposal for this)
98	SWDP11/5	Object	Part of the site is at risk of flooding, and is part of the 'green corridor' around the town centre. The site may be more suitable for community allotments

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98	SWDP11/6	Object	This development appears to create a barrier across the green corridor between Abbey Gardens and Crown Meadow
98	SDWP11	Object	The plan appears not to address the need for additional allotments within the town.
99	7.2.1 SWDP12	Support	We support the following elements of SWDP12: <ul style="list-style-type: none"> • Measures to improve accessibility through pedestrian and cycle links to Evesham town centre and Hampton, local employment areas, schools, sports, health and community facilities. • The provision of new pedestrian/cycle bridge across the River Avon from Hampton to the town centre. • Measures to improve accessibility through walking, cycling and public transport to the town centre, including a pedestrian/cycle crossing at the A46 trunk road.
99		Comment	It is surprising that no mention is made of the extensive proposals for further development of Evesham Country Park
136	SWDP22	Comment	It is unclear whether consideration has been given to the likely increase in the proportion of food supply being produced locally, and the corresponding decrease in the need to transport and distribute large quantities of produce from overseas.
135	13.3	Support	Development should not jeopardise future agricultural production.
152	17.1 SWDP26	Object	The following statement is unmeasurable, and therefore not very helpful: <i>All development will be of the highest design quality</i>
152		Support	a. Siting and layout We support the guidance for orienting buildings to maximise energy efficiency
152		Support	g. Appropriate facilities: development should incorporate appropriate waste management and storage facilities, provision for the storage of bicycles, connection to IT and other virtual communication networks and, where feasible, provision for a bus shelter and/or bus service to the development.
152-153		Object	There is no evidence within SDWP26 – Design that any emphasis will be placed on designing for sustainability, low energy use, efficient use of water, and waste disposal, use of locally sourced materials and materials with low embodied carbon, provision of space for growing food, Etc. While this is addressed to some extent elsewhere, we believe that it should be embedded in the design principles for all new development.
171	21.4	Object	Rather than simply accepting this as fact with very wasteful consequences, should we not be incentivising better use of existing housing stock?

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173	SWDP30	Support	The principle of granting permission for sub-division of larger accommodation should help to address the problem in 21.4 above
175	SWDP31	Support	We support the increased emphasis placed on affordable housing as a means to ensure that young people can remain in the communities to which they belong
205	25.1	Support	Local Green Networks are a valuable community resource
205	25.2	Support	An important characteristic of Local Green Networks is the linkage between green areas. Proposals should not compromise the integrity of the local green network
206	SWDP43	Support	We support policy SWDP43
206	25.5	Support	Private gardens are no longer considered brownfield land.
213	27.3	Support	Securing long term prosperity, quality of life for all, and a low carbon economy should be the overall aim of this plan!
215	27.1 SWDP46	Object	<p>While the intentions outlined in this section are commendable, we believe they are insufficient to result in the 80% reduction in Carbon emissions required by 2050. We believe that the SWDP needs to be more ambitious and assertive in its approach to Energy Efficiency. For example:</p> <ul style="list-style-type: none"> • Non-residential building should be required to achieve BREEAM very good or higher • All sites should be required to provide at least 20% of energy from on-site renewable source • More targeted and measurable requirements to improve existing development's environmental performance
222	SWDP49	Object	A 5% increase in HGV traffic is not consistent with the legal requirement to cut carbon emissions by 80% by 2050