

**The communities of Kempsey Parish -
within a generation of coalescence with Worcester City**

**Kempsey Parish Council's formal response to proposals within the
South Worcestershire Development Plan**

November 2011

Introduction

This covering letter and accompanying paragraphs form Kempsey Parish Council's response¹ to the consultation on proposals within the South Worcestershire Development Plan (SWDP), published 26th September 2011.

This response collates the work and analyses conducted by Kempsey Parish Council's SWDP Working Party - comprising of representatives from FLAG (Kempsey Flood Action Group),² the Worcester branch of Campaign to Protect Rural England (CPRE), PACT (Partners and Community Together)³, survey results⁴ contributed by community group SGIRA (Staying Green in Rural Areas) and Parish Councillors from Kempsey . It also incorporates the results of three community consultation sessions - two organised in order to collect resident's ideas and comments regarding the Parish Plan and the SWDP combined,⁵ and one specifically organised to draw resident's attention to the proposals within the SWDP.⁶ In this respect, this response is a true reflection of the wishes and aspirations of people local to the Parish of Kempsey and is a model for an all inclusive attempt at community collaboration and consultation.

This response covers the major concerns that Kempsey Parish Council has with the SWDP proposals for long term planning and development within the parish – the foremost of which must be, based on the content of the SWDP, the conclusion that previous input by the community and consultation responses from the Parish Council⁷ appear to have been wholly disregarded by planners at a district level. It remains to be seen as to whether the three councils involved in this process will demonstrate an ability to respond adequately to Kempsey Parish's concerns and ideas for a better and more sustainable way forward.

¹ Non confidential

² <http://kempseyflag.info/>

³ PACT is a forum in which members of the public, representatives of organisations, clubs, schools, the Police and local authority services can get together to plan and carry out activities of value to Kempsey community. <http://www.kempseyhub.co.uk/public-notice/pact.html>

⁴ To which 500 responses were collected via both online and paper surveys. www.sgira.co.uk

⁵ At which approximately 500 residents were consulted overall. <http://www.kempseyhub.co.uk/>

⁶ At which 90 residents attended and from which many comments were collected. Appendix 5.

⁷ With regard to the South Worcestershire Joint Core Strategy, the West Midlands Regional Spatial Strategy and with regard to earlier stages in the evolution of this South Worcestershire Development Plan

Persons that have directly contributed to this draft response

Robin Austin	- Kempsey Parish Council.
Mike Biddle	- Ex District Councillor and resident of Kempsey
Brian Clarke	- Representative of FLAG (Kempsey Flood Action Group), resident of Kempsey
Ray Ellis	- Representing the Campaign to Protect Rural England (CPRE), resident of Kempsey
Mike Legg	- Kempsey Parish Council.
John Michael	- Chairman for Kempsey Parish Council
Mike Stevens	- Kempsey Parish Council.
Lisa Stevens	- SGIRA (Staying Green in Rural Areas), resident of Kempsey.
Kathy Wallbridge	- SGIRA (Staying Green in Rural Areas), resident of Kempsey.
Terry Ward	- Ex Kempsey Parish Council Chairman.

Remaining timetable and processes for formulating the Parish Council response

This draft response to the SWDP was discussed at the Extraordinary Kempsey Parish Council Meeting Monday 24th October 2011, 7.30pm. A final version of the response will be submitted to Full Parish Council on Monday 14th November 2011, 7.30pm, for limited further amendments and adoption on the basis of those amendments.

Submission of this consultation response to the SWDP Panel by the SWDP Working Party on behalf of Kempsey Parish Council will occur by 5pm 17th November 2011 at the latest in the format of a paper response and also electronically via the procedure prescribed in the SWDP online consultation portal⁸. The closing date for consultation submissions to the SWDP Panel is 5pm, 18th November 2011. Members of the public may also submit individual responses direct to the SWDP Panel until 5pm, 18th November.

⁸ <http://swdp-consult.limehouse.co.uk/portal/>

Covering letter to Kempsey Parish Council response to the SWDP

- i) Kempsey Parish Council and the local community as a whole recognises the need for long term controlled development and community infrastructure to be located in South Worcestershire. However, it is felt that many of the basic assumptions behind the South Worcestershire Development Plan (SWDP) are incorrect and have led to an erroneous assessment of where development should be located and when and where investment in infrastructure should take place. Besides providing basic feedback, this response sets out the additional analyses that must be undertaken if the SWDP is to truly reflect local need.
- ii) Sustainable organic growth is good for Kempsey - this is represented by recent community work in the parish, an example of which is the flood alleviation scheme generated by FLAG,⁹ a local initiative group. So whilst it is not being suggested that the parish stand still, the sheer scale and spread of the proposed urban extension at Broomhall to the south of Worcester threatens the identity of Kempsey village, Kempsey Parish and its continued future development as a rural community.
- iii) Kempsey Parish Council welcomes the emphasis placed by the SWDP on ensuring that future development supports economic growth, however, if priority is given to economic benefits and consequences above and beyond local circumstances, this means that it is unlikely that any such plan would be sustainable in the long term. Kempsey Parish Council references Malvern Hills District Council's (MHDC) response to the draft National Planning Policy Framework (NPPF) which states that "We [MHDC] consider that the weight to be afforded to the economic benefits and consequences of a particular proposal should always be balanced against other relevant material considerations and a national "one size" fits all approach is unlikely to be appropriate and will not adequately reflect the diverse range of local economic aspirations and constraints."¹⁰ Kempsey Parish Council requires that the SWDP include a statement of the value of existing parish level economies and an acknowledgement that these must be planned for in conjunction with higher level designs to improve the long term economic health of South Worcestershire. Words to that effect should be included as an objective within Vision Objective "Economic Success that is shared by all"¹¹ and also incorporated within SWDP 1, Development Strategy 5.¹²
- iv) Under current proposals within the SWDP, 62%¹³ of the proposed urban extensions for Worcester will fall upon Kempsey Parish. Whilst the SWDP continually refers to the new settlement at Broomhall/Norton as an urban extension of Worcester (and all the relevant SWDP policies focus on this point), it is nonetheless true that this is a major encroachment of Kempsey Parish and that that same parish will be split into two disparate communities - the existing village to the south and the proposed

⁹ Kempsey Flood Action Group <http://kempseyflag.info/>

¹⁰ Taken from page 1 of the MHDC consultation response letter date 28th September 2011 submitted to Mr Alan Scott, Communities and Local Government. Appendix 2

¹¹ Vision Objective page 26

¹² SWDP 1, Development Strategy 5, page 29, paragraph 4.2

¹³ SWDP 8/1, page 76, paragraph 5.37

Broomhall development to the north. Both of these communities would fall under a single parish council administration. Such proposals are entirely contrary to SWDP 3,¹⁴ as they will not create an inclusive community and will result in a new settlement that would be entirely separated from immediate surroundings and existing local communities. Indeed the two communities would have very diverse and different requirements – making administration particularly difficult and having the potential to jeopardise the long term viability of the existing Kempsey village on multiple levels. If the principles within the SWDP are to be met,¹⁵ then the housing numbers allocated to the Broomhall site in Kempsey Parish need to be significantly reduced. Kempsey Parish Council demands that this re-evaluation proceed before the SWDP plan and proposals are finalised.

- v) At a basic administrative level, the 2:1 representational majority that the proposed Broomhall community would theoretically have, would result in Kempsey village being unable to benefit from any increased precept, since the increased budget would by necessity go to the majority development at Broomhall.¹⁶ From a more serious perspective, the proposed development would compromise the ability of Kempsey village to grow and remain viable in the long term and ultimately would compromise the ability of future generations to meet their own needs as a village community. Community survey work¹⁷ suggests that the existing community does not have a requirement for large scale additional housing, but does require assistance with the gradual and sustainable growth of the village. This is demonstrated by the indication of the range of additional services/facilities that are required¹⁸ and in the requirement for a small number of additional houses within the village that will allow downsizing and will also allow children to leave home and yet remain in the village.¹⁹ Sustainable growth also requires assistance in ensuring the long term viability of existing businesses in the parish and in improving the infrastructure and IT links to the wider area.
- vi) Kempsey village is the culmination of hundreds of years of evolution. Inserting a fully fledged community to the north of the parish in such a short space of time, will ensure the demise of the existing village by sealing the fate of existing businesses, thereby reducing the village to that of “commuter belt” status whilst ensuring that residents have no option but to travel by vehicle in order to access services and jobs that are no longer present in the village.²⁰
- vii) Under current proposals the proposed Broomhall development to the north of the parish will dominate the landscape and will be provided with all the facilities that Kempsey village requires whilst ensuring that no such facilities will ever be placed in the existing village.

¹⁴ SWDP 3, page 46, principle 7.

¹⁵ Particularly Vision Objective “Economic Success that is shared by all” Objective 2, page 26, paragraph 3.6 AND SWDP 1, Development Principles 3, 5 and 9, pages 29 and 30, paragraph 4.2.

¹⁶ Furthermore it is unlikely that Kempsey village would derive maximum benefit from S106 agreement contributions or from the Community Infrastructure Levy generated by any development to the north of the parish.

¹⁷ SGIRA Survey Appendix 4

¹⁸ SGIRA Survey Appendix 4

¹⁹ SGIRA Survey Appendix 4

²⁰ There are currently 77 businesses within Kempsey Parish. A large majority of residents indicate that they travel to work by car. This number will only increase if the number of jobs in the village is reduced and if more people have to travel in order to find work. SGIRA Survey Appendix 4.

- viii) The current SWDP proposals²¹ will not safeguard the natural and built environment²² that makes Kempsey Parish home to its residents and of conservational importance to South Worcestershire and will not assist the community maintaining its historic character first established over 2,000 years ago. Not only is the current proposed housing allocation contrary to the overarching “Sustainable Development Principles” set out in SWDP 3,²³ it also fundamentally contradicts the design principles within SWDP 26.²⁴ The proposed development will not enhance and conserve the existing landscape character, and will not protect the individual character of the settlement of Kempsey. It has the serious potential to undermine recent community works to ensure that the parish is protected from future flooding, unless surface water run-off from the development is directed in to the Severn rather than the Hatfield Brook. Kempsey Parish Council requires that the proposed housing allocation for the Broomhall site be fundamentally re-examined on the basis of the above.
- ix) Ultimately, under these proposals²⁵ a precedent will be set and Kempsey Parish will be absorbed within subsequent urban extensions and will be lost. The reduction of the significant gap is a visible manifestation of this fate for the village. The statement in SWDP 1²⁶ that significant gaps cannot be guaranteed in the longer term, ultimately means that Kempsey village is within one generation of coalescence and that Kempsey Parish as a rural community will cease to be. We believe that the existing significant gap to the north of the parish as shown in the current MHDC local plan²⁷ should be maintained in full to meet the requirements of SWDP 3 and SWDP 43. The SWDP aims to avoid coalescence of communities but this will not be achieved if the plan goes ahead in its present format. Kempsey Parish Council believes that there is a serious case for a full review of green belt land and significant gaps to be conducted and notes that Malvern Hills District Council has already requested that this process be undertaken in its response to the draft National Planning Policy Framework.²⁸
- x) Kempsey Parish Council believes that it is unsustainable for the parish to accommodate 2450 dwellings and 20 hectares of industrial land²⁹ – the scale of which would represent a 185% increase of development over the size of the current parish. Instead of accepting the present allocation which would, as previously mentioned, create a dominant settlement to the north of the parish, Kempsey Parish Council seeks to promote sustainable development in Kempsey village itself and to encourage controlled growth on previously identified sites within the immediate environs of the village. To this extent the Parish Council has formed a commitment to develop a Neighbourhood Plan.

²¹ NB. Specifically, the insertion of 2450 houses to the north of the parish, and the lack of protection afforded by the SWDP To existing communities

²² SWDP 3, page 46, principle 6

²³ SWDP 3, page 44 onwards.

²⁴ SWDP 26, Design Principle D, page 152, paragraph 17.1.

²⁵ Specifically, the SWDP proposal to insert of 2450 houses to the north of the parish and the lack of guaranteed protection for the remaining significant gap beyond the SWDP plan period. SWDP1, page 30, Development Strategy Principle 10.

²⁶ SWDP 1, page 30, principle 10

²⁷ Malvern Hills District Council Local Plan 2006 – 2009 (NB The Local Plan version that predates the Saved Policy decision). <http://www.malvern hills.gov.uk/cms/planning-and-the-environment/development-plans/local-plan.aspx>

²⁸ Page 2 of the MHDC response to the National Planning Policy Framework consultation, dated 28th September 2011 submitted to Mr Alan Scott, Communities and Local Government. Appendix 2.

²⁹ SWDP 1, page 80

- xi) The proposed development within the village of Kempsey is supported in full by Kempsey Parish Council on the basis of this being broadly in line with the Kempsey Parish Housing Needs Survey (HNS) carried out in 2009.³⁰ Further to this, the HNS; current anecdotal evidence;³¹ and the recent community survey,³² indicates a requirement for between 90 and 150 homes: 30 – 50 of which would need to be affordable - mainly for young people trying to get on the housing ladder, but also for some elderly residents wishing to downsize. The Parish Council would strongly support measures to give priority to younger residents and returning former residents over applicants for these homes from outside Kempsey and requires that the current rules for prioritising those with a local connection are maintained.
- xii) The entire allocation for the Village is based upon the analysis that Kempsey is a Category 1 Village.³³ Whilst the Parish Council supports the allocation of 133 houses to the village itself, it is strongly believed that the Category 1 village classification should not be taken as an indication that the community is sufficiently robust enough to allow it to successfully assimilate an entire new settlement and industrial estate to the north of the parish. The initial case for Kempsey being classified as a Category 1 village was based on work carried out 10 years ago, pre recession, when the village had two general stores, post-office, hairdressers and a hardware store. This is no longer the case, and whilst the local sense of identity remains strong, much work is being championed by the Parish Council to try to enable the village to re-establish the physical centre of the community. The village has already lost many of its amenities through no fault of its own (e.g. the post office) and efforts to try to re-instate these will be undermined by the SWDP in its present format, since the entire focus of the parish will move north to the proposed Broomhall extension.
- xiii) Better facilities (IT / Broadband) are required in the village to encourage smaller businesses to locate here and once in place these additional facilities will also serve to sustain the 77 existing businesses in the local area. However, the current SWDP will ultimately harm many of these services by diverting resources to the extreme north of the parish.
- xiv) Therefore, whilst Kempsey Parish Council does not ask that the Kempsey village classification be reconsidered, it does strenuously request that parishes that contain a Category 1 village, are protected in the long term from further development above and beyond the capacity that that parish can sustainably accommodate and that would pose a risk to the long term viability of that Category 1 settlement. Kempsey Parish Council requires that SWDPs 1, 2, 3, 8 and 23 are re-written to include the above points.

³⁰ Kempsey Parish Council Housing Need Survey 2009: <http://www.sgira.co.uk/rss--swjcs.html> (Document 10)

³¹ Evidence contained within the current Kempsey Parish Plan and being incorporated within the forthcoming updated Kempsey Parish plan and within the forthcoming Kempsey Parish Neighbourhood Plan.
<http://www.kempseyhub.co.uk/about-kempsey/the-parish-plan.html>

³² SGIRA Survey Appendix 4

³³ Page 35, page 133 (paragraph 12.3 & 12.4), page 134 (paragraph 12.6), Policy SWDP 23:Category 1 Village Sites, page 139/140.

- xv) Kempsey Parish Council feels that the overall industrial requirement of 309 hectares identified within the SWDP appears to be too large when the current need is low and where no accompanying specific land or job targets have been identified within the plan. Concerning the specific allocation for 20 hectares of industrial land to the north of the parish, Kempsey Parish Council feels that this is entirely inappropriate on this green field site. The Parish Council requires to see the evidence of this supposed demand and that the industrial units will be occupied before this allocation is included in the finalised SWDP proposals. The SWDP states that 60 % of the projected population growth is within the over 75's who do not work³⁴. On this basis Kempsey Parish Council questions the need for all this industrial land in South Worcestershire, particularly when it is considered that many existing Worcester city centre sites remain unoccupied.
- xvi) There are further concerns relating to the type of industry that would be attracted to the parish. On the proposed site to the north of Kempsey Parish, it is likely that these would be mostly warehouse based, consequently bringing limited employment opportunities of a low skilled nature to the parish, which will be detrimental in assisting local people to afford to buy the houses that would be built in the proposed extension or in the village itself. Overall Kempsey Parish Council has no objections to encouraging rural employment and developing rural employment opportunities, but these must be sympathetic to the environment and sustainable for the Parish in the long term. Therefore it is important that work is undertaken to encourage high-tech industries to the parish.
- xvii) Kempsey Parish Council has serious concerns about the impact that the proposed Broomhall development would have on existing infrastructure. The A4440 southern link road is currently at full capacity for the majority of the day and experiences complete standing traffic at peak commuter times. The Worcester Transport Strategy has identified that major work to the A4440 southern link is necessary in order to deal with current and projected³⁵ transportation requirements. This analysis does not take into account any additional development planned as part of the SWDP – development which would render immediate and significant infrastructure improvements an absolute necessity. Indeed, locating the majority of the proposed Worcester urban extension housing allocation to the south of Worcester will further exacerbate current levels of commuting along the M5 to the West Midlands Conurbation and to Gloucestershire and beyond to Bristol. Kempsey Parish Council has extreme concerns that whilst the SWDP acknowledges that these infrastructure improvements are an essential requirement if the large scale housing development proceeds, no funding sources have been identified. This is not acceptable and alternative options which are infrastructure led and for which funding sources have been identified, must be established before the SWDP plan and proposals are finalised.
- xviii) Since upgrades to existing infrastructure is a major requirement, if any new businesses are to be encouraged to locate in the area, it must be concluded that the SWDP is not driven by the economy.

³⁴ SWDP 1, page 17, table 1

³⁵ NB. "Projected" means projected traffic increases without further development to the proposed Broomhall/Norton site.

This plan therefore fails in its primary objective – for local communities to establish their own local growth requirements for employment, housing and other land uses.³⁶ Planning for long term growth without planning for long term infrastructure is high risk, expensive and will not help the local economy. The fact that the three District Councils are intending to press on without the necessary infrastructure development is irresponsible and detrimental to the people who will be the victims of this underinvestment. Kempsey Parish council demands that the sources of funding for infrastructure and the timing of that funding (associated with the Community Infrastructure Levy and other sources) be clarified before the SWDP plan and proposals are finalised.

- xix) Kempsey Parish Council also requires that work be undertaken to re-examine the viability of placing additional allocations to the east of Worcester as, it is understood, has also been argued by the business sector itself.³⁷ Locating additional development here would reduce the distance that transport would need to travel to reach the M5.
- xx) Additionally, work should be undertaken to re-evaluate the housing allocations to the west of Worcester - allocations which are considered by Kempsey Parish Council to be too low when it is considered that the west of the city is currently served by good bus routes and has a shorter travel time to the city centre than from the south.³⁸
- xxi) On 5th July 2011 Malvern Hills District Council voted, by the casting vote of the Chairman, to proceed to the consultation stage of the SWDP on the basis of background information provided in the “Special Council Agenda – Report C300”. That report stated³⁹ that the 2008 population projections show an increase between 2008-2030 of 25,100 people, equating to a projected increase in the number of households in South Worcestershire of 21,600.
- xxii) This equates to an average household size (occupancy rate) of 1.19. Subsequently, in the SWDP published for consultation, the average household size assumption is 2.3, falling to 1.9 by 2030. However, the housing allocations overall have not been amended to reflect this change. Kempsey Parish Council therefore has serious concerns over the validity of the projected housing requirements which erroneously remain in line with previous household size assumptions. If the figures upon which the district councillors voted are true, then the number of new dwellings required drops to 13,000 houses only. This negates the need for an urban expansion to the south of Worcester, since local level housing need would be met by Worcester City from within its own resources. Kempsey Parish Council requires that the overall housing allocation figures are re-examined in light of the above and that the proposed urban extension to the South of Worcester is given priority in receiving any corresponding reduction in housing allocation.

³⁶ SWDP Foreword page 6.

³⁷ SWDP 8, page 73, paragraph 5.25.

³⁸ Kempsey Parish Council SWDP Working Party estimates that travel time from the south to the city centre is 18 minutes, whilst from the west and east the average travel time to the city centre is 12 minutes only.

³⁹ Para 6.4 of the Malvern Hills District Council Special Council Agenda – Report C300. Appendix 3

xxiii) To further elaborate on the meeting on 5th July 2011, the plan in its current form found very little support from MHDC Councillors and only passed to the consultation stage through the Chairman's casting vote to prevent the possibility of unregulated development. We concur with the views expressed at that meeting that the central theme of the plan, the urban expansion of Worcester, for the benefit of Worcester, had very little to offer the surrounding areas. We also agree with the conclusions of the majority of Councillors that the plan was unimaginative and piecemeal and did not address the issues it sought to solve. We favour a much bolder approach that commences with the joining of the northern and southern link roads to form a proper dual carriageway ring road around Worcester. This would allow planners more flexibility and options in siting future developments in the most appropriate places.

xxiv) The SWDP Vision Objectives state that it is hoped that the SWDP will provide a basis for Neighbourhood Plans⁴⁰, though it provides no further elaboration on this point. It is acknowledged that Neighbourhood Plans cannot be used to set aside the provisions of local authority development plans, with respect to proposed growth, and therefore cannot be used to control or reduce future development. However, Kempsey Parish Council intends to proceed towards further involvement in the community development framework and to work towards producing a Neighbourhood Plan⁴¹ which will be used as a force for positive, locally driven growth and development as detailed in the Localism Bill.

⁴⁰ Vision Objective "Stronger Communities" Objective 5, page 27

⁴¹ As detailed in CLG guidance, the Neighbourhood Plan will not be completed before the SWDP is finalised and will be prepared in parallel to that same document.

SWDP 1 – Development Strategy & Settlement Hierarchy

- i) SWDP 1 establishes the principles in which the development plan is rooted. The current Kempsey Parish Plan supports the basic principles (1-12) within this section but the council has serious reservations about the background thinking and the extent to which implementation of this strategy will be possible.
- ii) SWDP 1⁴² aims that “development will take place where enhancement of existing infrastructure will support the retention of provision of services and facilities.” SWDP 4 and 8/1 acknowledges the current serious road network issues along the A4440 (southern link road). Since the implementation and phasing section of the SWDP gives no indication of when enhancement of existing infrastructure along the A4440 will take place, and, since the “Key Issues and Challenges”⁴³ acknowledges that there is a serious funding gap, and since it is by no means certain that Government grants for infrastructure development will be forthcoming, it must be assumed that such improvements will not take place until after serious levels of community infrastructure levy contributions have been collected – i.e., well into Phase 3 of the plan (2019-2030).
- iii) SWDP 4⁴⁴ states that the Highways Agency has indicated that the existing Worcestershire Local Transport Plan 3 (including the Worcester Transport Strategy Phase 1) only addresses existing transportation needs at 2010 levels (along with projected background growth in traffic levels). Taking this acknowledgement that the A4440 is already at full capacity, it is clear that SWDP 1 does not fulfil the plan criteria to place emphasis on a stronger link between growth and infrastructure⁴⁵, will not lead to fulfilment of the Vision that residents and businesses will have better accessibility through major improvements to the A4440⁴⁶ and will not fulfil the objective⁴⁷ that development will be placed in a location where there is good access to local services and where transport choice is maximized. The fact that infrastructure is not mentioned explicitly anywhere in the Objectives speaks volumes about the district councils confidence that this plan is in anyway deliverable and undermines SWDP 1 that states that “development will be infrastructure led where new development is infrastructure dependent”.⁴⁸ No evidence is put forward by the SWDP to suggest that any analysis has taken place in this respect, beyond the sweeping statements concerning the need to improve the A4440. Kempsey Parish Council requires that the development plan ensures that significant infrastructure improvements pre-date any significant development commencement.

⁴² SWDP 1, page 29, paragraph 4.2, Development Strategy Principle 3

⁴³ Key issues & challenges, Infrastructure delivery, page 21, paragraph 2.23

⁴⁴ SWDP 4, page 54, last paragraph in section “delivering transport infrastructure to support economic prosperity”

⁴⁵ SWDP 1, page 24. paragraph 3.3.

⁴⁶ Vision, page 25, 2nd paragraph.

⁴⁷ Vision Objectives, Stronger Communities Objective 4, page 27

⁴⁸ SWDP 1, page 29, paragraph 4.2, Development Strategy Principle 4.

- iv) SWDP 1⁴⁹ states that with regard to its scale and type, development will always be commensurate with and appropriate to, the size and characteristics of the host settlement – a policy that is reiterated by SWDP 26⁵⁰. In respect of the proposed growth to the south of Worcester, this principle in no way acknowledges the needs and characteristics of the existing communities of Kempsey and Norton. In line with SWDP 3⁵¹ which states that “all development must reduce the impact on local communities by ensuring that the location and nature of the proposed development, including its relationship to, and impact on, its immediate setting, the locality and local communities, is appropriate”, Kempsey Parish Council proposes the re-drafting of development strategy principle 5 to include the following “any such development on the fringes of Worcester must also mitigate against significantly reducing the ability of the host communities to continue to experience long term organic growth and must not impact upon the long term viability of businesses within those communities.”
- v) Kempsey Parish Council would also support the inclusion of an overarching Vision Objective supporting this very point - in “ensuring that host communities (in this case the parish of Kempsey) are afforded all possible assistance in remaining healthy and sustainable neighbourhoods with an ability to grow and adapt positively to change”.
- vi) With regard to SWDP 1,⁵² Kempsey Parish Council supports the principle that the Significant Gap should be maintained between Kempsey and the city of Worcester, a request that was included in the old 5 year Parish Plan, one that is being reiterated in the forthcoming Parish Plan (2012-2017) and in the forthcoming Neighbourhood Plan and one that is still fully supported by the residents of Kempsey Parish⁵³. In the absence of green belts, significant gaps serve to prevent coalescence and serve the important function of maintaining a clear separation between communities of two very different characters. Furthermore, significant gaps go much further than described in SWDP 1⁵⁴ beyond providing a buffer/visual break, significant gaps serve to encourage the health and growth of local businesses in those settlements close to the boundary of Worcester city, by encouraging local residents to use local services within walking distance within the existing village environment. Any reduction or slow erosion in the existing gap between Worcester city and Kempsey village would have a serious impact of the long term viability of our community and its businesses and is not acceptable to our community.
- vii) Kempsey Parish Council cites both the SWDP, which acknowledges the desire to avoid the coalescence of communities⁵⁵, and also the acknowledgement made by Malvern Hills District Council that “communities previously unaffected by the continuing expansion of existing urban areas are keen to receive the long term assurance that the identity of their communities and important tracts of open

⁴⁹ SWDP 1, page 29, paragraph 4.2, Development Strategy Principle 5.

⁵⁰ SWDP 26, page 162, first paragraph.

⁵¹ SWDP 3, page 46, principle 7.

⁵² SWDP 1, page 30, paragraph 4.3, Development Strategy Principle 10.

⁵³ SGIRA Survey Appendix 4

⁵⁴ SWDP 1, page 32, paragraph 4.8.

⁵⁵ SWDP 1, page 30, paragraph 4.2, Development Strategy Principle 10.

countryside will be protected. Whilst it is accepted that much can be done to protect interests of acknowledged importance through the use of Development Management policies and Green Infrastructure, these do not provide the long term policy control which can be relied upon beyond the next review of the development plan. The draft NPPF could be much more supportive in recognising that circumstances and pressures have changed in some locations resulting in the need to re-assess the case for the designation of new Green Belt.”⁵⁶

- viii) Kempsey Parish Council therefore requires the re-wording of SWDP 1⁵⁷ to include the following - “that a significant gap policy prevents coalescence or loss of the special character of freestanding settlements and maintains the ability of an individual community to remain viable in the long term.” In light of the above, Kempsey Parish Council also requires that the analysis and conclusions put forward by the West Midlands Regional Spatial Strategy Examination in Public be re-assessed and that Kempsey Parish be re-considered for green belt status.

SWDP 2 – Development Strategy: Employment, Housing & Retail Supply

- i) SWDP 2 “Employment, Housing and Retail Supply” sets out the proposed levels of development over the plan period (until 2030). In its commencing paragraph, SWDP 2 states that due to the recession there is a significant reduction in housing stock delivery and availability. This is disputed by Kempsey Parish Council who understand that housing delivery as set by the last plan⁵⁸ was exceeded, that there was a deliberate reduction in house building before the recession began and that in 2004 a moratorium was placed to restrict building, since the 1996-2011 plan was deemed to have been met. Some 40% of the new requirement a set within the SWDP (up to 2030) is also built, started or planned⁵⁹ and therefore on this basis South Worcestershire cannot possibly have a housing shortfall based upon local need. This is supported by local survey evidence⁶⁰ where 91% of residents say that they have not experienced a housing shortfall and 80% that they have no need of new housing in the foreseeable future.
- ii) Kempsey Parish Council believes that it is unsustainable for the parish to accommodate 2450 dwellings and 20 hectares of industrial land⁶¹ – the scale of which would represent a 185% increase of development over the size of the current parish. Instead of accepting the present allocation, which would as previously mentioned, create a dominant settlement to the north of the parish, Kempsey Parish Council seeks to promote sustainable development in Kempsey village itself and to encourage

⁵⁶ Page 2 of the MHDC response to the National Planning Policy Framework consultation, dated 28th September 2011 submitted to Mr Alan Scott, Communities and Local Government. Appendix 2.

⁵⁷ Specifically SWDP 1, page 30, paragraph 4.2, Development Strategy Principle 10.

⁵⁸ South Worcester Joint Core Strategy

⁵⁹ SWDP Foreword, page 7. “Already 40% (around 8,000 dwellings) of the 20,361 dwellings recommended by this document for South Worcestershire up to 2030 have either been built since 2006, are under construction or have the benefit of planning permission or a previous Local Plan allocation for development”.

⁶⁰ SGIRA Survey Appendix 4

⁶¹ SWDP 1, page 80

controlled growth on previously identified sites within the immediate environs of the village. To this extent the Parish Council has formed a commitment to develop a Neighbourhood Plan.

- iii) The proposed development within the village of Kempsey is broadly supported by Kempsey Parish Council on the basis of this being in line with the Kempsey Parish Housing Needs Survey (HNS) carried out in 2009.⁶² It should also be noted that there are other sites to the east of the village that are currently less productive agricultural land that have the potential to also address the housing needs of the village. Kempsey Parish Council would support further analysis to determine whether this would be a viable alternative if objections arise regarding the land currently allocated for housing within the village.
- iv) The HNS; current anecdotal evidence;⁶³ and the recent community survey,⁶⁴ indicates a requirement for between 90 and 150 homes: 30 – 50 of which would need to be affordable - mainly for young people trying to get on the housing ladder, but also for some elderly residents wishing to downsize. The Parish Council would strongly support measures to give priority to younger residents and returning former residents over applicants for these homes from outside Kempsey and requires that the current rules for prioritising those with a local connection are maintained.
- v) The entire allocation for the Village is based upon the analysis that Kempsey is a Category 1 Village.⁶⁵ Whilst the Parish Council supports the allocation of 133 houses to the village, it is strongly believed that the village classification should not be taken as an indication that the community is sufficiently robust enough to allow it to successfully assimilate an entire new settlement and industrial estate to the north of the parish. The initial case for Kempsey being classified as a Category 1 village was based on work carried out 10 years ago, pre recession, when the village had two general stores, post-office, hairdressers and a hardware store. This is no longer the case, and whilst the local sense of identity remains strong, much work is being championed by the Parish Council to try to enable the village to re-establish the physical centre of the community.
- vi) Therefore, whilst Kempsey Parish Council does not ask that the Kempsey village classification be reconsidered, it does strenuously request that parishes that contain a Category 1 village, are protected in the long term from further development above and beyond the capacity that that parish can sustainably accommodate and that would pose a risk to the long term viability of that category 1 settlement. Kempsey Parish Council requires that SWDPs 1, 2, 3, 8 and 23 are re-written to include the above points.

⁶² Kempsey Parish Council Housing Need Survey 2009: <http://www.sgira.co.uk/rss--swjcs.html> (Document 10)

⁶³ Evidence contained within the current Kempsey Parish Plan and being incorporated within the forthcoming updated Kempsey Parish plan and within the forthcoming Kempsey Parish Neighbourhood Plan.
<http://www.kempseyhub.co.uk/about-kempsey/the-parish-plan.html>

⁶⁴ SGIRA Survey Appendix 4

⁶⁵ Page 35, page 133 (paragraph 12.3 & 12.4), page 134 (paragraph 12.6), Policy SWDP 23:Category 1 Village Sites page 139/140.

- vii) SWDP 2 states that “in order to achieve sustainable development, a wide range of infrastructure needs to be delivered.⁶⁶ The ongoing uncertainty in funding infrastructure is reflected in the level of housing supply proposed and its phasing”. Since the 20% reduction of house building allocation against the previous regional housing requirements for South Worcestershire (within the Regional Spatial Strategy) is based upon a 20% drop in household projections (2008 projections),⁶⁷ Kempsey Parish Council feels that the previously described overbuild and the indentified infrastructure funding gap should also be a serious consideration when setting the housing allocations and that an overall reduction of 40% should be proposed by the Plan. Any such reduction in house building should be taken from the 3rd phase of development, so that the Community Infrastructure Levy can continue to contribute to infrastructure requirements.
- viii) With regard to SWDP 2,⁶⁸ the alternative scenario where additional growth at Worcester was rejected on the basis that major investment in infrastructure would be required and that new communities would be difficult to integrate with the city as a whole. Kempsey Parish Council feels that these constraints and considerations equally apply to the Broomhall proposed development site as well. In order for any new community at Broomhall and Norton to be viable and flourish, significant amounts of infrastructure investment will be required to be in place before development is completed. Kempsey Parish Council requires that Worcester City sites be re-examined for the viability of housing allocations. Furthermore, once additional housing allocations are found for Worcester City sites, the Broomhall proposed development should be prioritized for a corresponding decrease in housing allocation.
- ix) If houses and industry are located on the proposed Broomhall site without a corresponding increase in the capacity of the A4440 (beyond current projected capacity requirements if no development takes place), then any such community would suffer isolation (as a complete separate development from St Peters in Worcester), a lack of community cohesion and would exist in an environment in which businesses would find it difficult to thrive. Kempsey Parish Council feels that SWDP 2 and the proposal for significant development at Broomhall contravenes SWDP 3⁶⁹ for this very reason, since developments without adequate infrastructure will “impact upon the amenity of local residents and will severely compromise the potential to help reduce carbon emissions”.
- x) On 5th July 2011 Malvern Hills District Council voted, by the casting vote of the Chairman, to proceed to the consultation stage of the SWDP on the basis of background information provided in the “Special Council Agenda – Report C300”. That report stated⁷⁰ that the 2008 population projections show an increase between 2008-2030 of 25,100 people, equating to a projected increase in the number of households in South Worcestershire of 21,600.

⁶⁶ SWDP 2, page 38, paragraph 4.16

⁶⁷ SWDP 2, page 38, paragraph 4.16

⁶⁸ SWDP 2, page 42, paragraph 4.24

⁶⁹ SWDP 3, page 44, paragraph 4.29.

⁷⁰ Para 6.4 of the Malvern Hills District Council Special Council Agenda – Report C300 Appendix 3.

- xi) This equates to an average household size (occupancy rate) of 1.19. Subsequently, in the SWDP published for consultation, the average household size assumption is 2.3, falling to 1.9 by 2030. However, the housing allocations overall have not been amended to reflect this change. Kempsey Parish Council therefore has serious concerns over the validity of the projected housing requirements which erroneously remain in line with previous household size assumptions. If the figures upon which the district councillors voted are true, then the number of new dwellings required drops to 13,000 houses only. This negates the need for an urban expansion to the south of Worcester, since local level housing need would be met by Worcester City from within its own resources. Kempsey Parish Council requires that the overall housing allocation figures are re-examined in light of the above and that the proposed urban extension to the South of Worcester is given priority in receiving any reduction in housing allocation. In addition to this Kempsey Parish Council requests that the population figures and therefore housing demand are revised when the 2011 census data is available

SWDP 3 – Development Strategy: Overarching Sustainable Development Requirements

- i) SWDP 3 “Overarching sustainable development requirements” sets out the principles which all developments must meet if they are not to impact on the amenity of local residents⁷¹. Principle 4 of SWDP 3 states that all development proposals must ensure that the “strategic and local road network will be capable of safely and without environmental consequences accommodating the type and volume of traffic likely to be generated”. Kempsey Parish Council strongly feels that, in its current proposed format, the Broomhall development will not meet this principle, since under current proposals that development will precede significant infrastructure improvements. SWDP 4 acknowledges that the Highways Agency has indicated that Phase 1 of the Worcester Transport Strategy will only address existing transportation needs. Since any significant Community Infrastructure Levy will not be forthcoming until at least Phase 3 of the development plan, the resulting infrastructure funding gap will exacerbate the current crisis in the local road network and will bring about paralysis of any emerging community in the north of Kempsey Parish.
- ii) Kempsey Parish Council also feels that principle 7 of SWDP 3⁷² does not take sufficient account of the need to reduce the impact that increased traffic levels as a result of the proposed Broomhall development will have on existing communities. Beyond re-examining the viability of providing development before identified funded infrastructure, Kempsey Parish Council requires that principle 7 of SWDP 3 to be re-drafted to include a paragraph “ensuring that adequate and appropriate infrastructure is in place in order to cope with identified existing traffic problems and those problems that will arise as a result of projected increases in use of that infrastructure once development begins”. This amendment would then be in compliance with SWDP 4,⁷³ which focuses on the need to address the travel requirements of existing residents.

⁷¹ SWDP3, page 44, paragraph 4.29.

⁷² SWDP 3, page 46, principle 7.

⁷³ SWDP 4, page 47, paragraph 4.35

- iii) Under current proposals within the SWDP, 62%⁷⁴ of the proposed urban extensions for Worcester will fall upon Kempsey Parish. Whilst the SWDP continually refers to the new settlement at Broomhall/Norton as an urban extension of Worcester (and all the relevant SWDP policies focus on this point), it is nonetheless true that this is a major encroachment of Kempsey Parish and that the same Parish will be split into two disparate communities - the existing village to the south and the proposed Broomhall development to the north. Both of these communities would fall under a single parish council administration.
- iv) Such proposals are entirely contrary to SWDP 3,⁷⁵ will not create an inclusive community and will result in a new settlement that would be entirely separated from immediate surroundings and existing local communities. Indeed the two communities would have very diverse and different requirements – making administration particularly difficult and with the proposed new community at Broomhall having the potential to jeopardise the long term viability of the existing Kempsey village on multiple levels. If the principles within the SWDP are to be met⁷⁶, then the housing numbers allocated to the Broomhall site in Kempsey Parish need to be drastically reduced and Kempsey Parish Council demands that this re-evaluation proceed before the SWDP plan and proposals are finalised.

SWDP 4 – Development Strategy: Moving Around South Worcestershire

- i) SWDP 4 sets out the context of travel and infrastructure in South Worcestershire and details those areas where congestion is particularly bad. Kempsey Parish Council strongly feels that the inclusion of the A4440 (southern link road) in paragraphs 4.35 and 4.38 supports the conclusion that the proposed Broomhall development is not sustainable in both the short and long term and does not meet SWDP 3, principles 4 & 7.⁷⁷
- ii) Kempsey Parish Council has serious concerns about the impact that the proposed Broomhall development would have on existing infrastructure. The A4440 southern link road is currently at full capacity for the majority of the day and experiences complete standing traffic at peak commuter times. The Worcestershire Local Transport Plan has identified that major work to the A4440 southern link is necessary in order to deal with current and projected transportation requirements⁷⁸. This analysis does not take into account any additional development planned as part of the SWDP – development which would render immediate and significant infrastructure improvements (including the re-design of the M5 motorway junctions) an absolute necessity. Indeed, locating the majority of the houses to the south of

⁷⁴ SWDP 8/1, page 76, paragraph 5.37

⁷⁵ SWDP 3, page 46, principle 7.

⁷⁶ Particularly Vision Objective “Economic Success that is shared by all” Objective 2, page 26, paragraph 3.6 AND SWDP 1, Development Principles 3, 5 and 9, pages 29 and 30, paragraph 4.2.

⁷⁷ SWDP 3, pages 45 & 46

⁷⁸ Worcestershire Local Transport Plan, Projects W4, W5, W16.

<http://www.worcestershire.gov.uk/cms/local-transport-plan/the-local-transport-plan.aspx>

Worcester will yet further exacerbate current levels of commuting along the M5 to the West Midlands Conurbation and to Gloucestershire and beyond to Bristol. Kempsey Parish Council has extreme concerns that whilst the SWDP acknowledges that these infrastructure improvements are an essential requirement if the large scale housing development proceeds, no funding sources have been identified and the SWDP should be amended in this respect.

- iii) This lack of forward planning is aptly illustrated by the fact that the context map⁷⁹ gives no indication of the main commuting flow along the A4440 southern link road, as the ONLY route from Malvern to Droitwich Spa, without traversing the city centre. Kempsey Parish Council requires that the context map be re-drawn to illustrate this.
- iv) Since infrastructure is also a major requirement if any new businesses are to be encouraged to locate in the area, it must be concluded that the SWDP is not driven by the economy.
- v) This plan therefore fails in its primary objective – for local communities to establish their own local growth requirements for employment, housing and other land uses. Planning for long term growth without planning for long term infrastructure is high risk, expensive and will not help the local economy.
- vi) Kempsey Parish Council cites the response by Malvern Hill District Council to the draft NPPF which acknowledges that:

“in South Worcestershire the funding and delivery of essential infrastructure, particularly transportation infrastructure, represents a massive challenge. A challenge which was neatly sidestepped by the RSS”.⁸⁰

Kempsey Parish Council submits that the argument that the RSS does not adequately address transportation infrastructure ALSO applies to the SWDP. Furthermore, the statement by Malvern Hills District Council that it rejects the advice within the NPPF that “development should not be prevented on transport grounds unless the residual impacts of development are severe”⁸¹ is bizarre in light of the fact that this is exactly what is being supported by the SWDP. In their response to the NPPF, MHDC go on to say that:

“potentially committing local communities and business to on-going problems and unacceptable conditions where the network is already overloaded, is not in the interests of genuine economic growth and prosperity”

– a statement that is fully supported in this response. Kempsey Parish Council submits that these reasons for rejecting policies within the NPPF are equally valid with regards to the SWDP and that the SWDP should be entirely re-examined in light of these comments.

⁷⁹ Context Map, page 16

⁸⁰ Page 4 of the MHDC response to the National Planning Policy Framework, dated 28th September 2011 submitted to Mr Alan Scott, Communities and Local Government. Appendix 2.

⁸¹ Page 4 of the MHDC response to the National Planning Policy Framework, dated 28th September 2011 submitted to Mr Alan Scott, Communities and Local Government. Appendix 2.

- vii) The acknowledged funding gap (SWDP 4⁸²), the implied acknowledgement of the funding gap by the Phasing Plan (SWDP 50⁸³) and the further acknowledgement that “Phase 1 package of measures will not, on their own, be sufficient to deliver the levels of development”⁸⁴ are unacceptable to existing communities who would suffer the adverse impacts of increased traffic problems, beyond those already projected without further development. Indeed the current work to improve the A4440 Whittington roundabout is acknowledged by Worcester City Council to only be of assistance to current demand. The fact that the three district councils are intending to press on without the necessary infrastructure development is irresponsible and deeply detrimental to the people who will be the victims of this underinvestment. Without sustainable investment before development starts, the entire stretch of A4440 will become gridlocked and communities and businesses will suffer alike. Kempsey Parish Council requires that the SWDP contain written assurances of when, where and how investment in infrastructure will be made. There is no evidence in the current version of the SWDP that planners have given appropriate consideration to the potential impacts of development on the strategic highways. The principles of forward planning still apply to “bottom up planning documents”⁸⁵ and these principles should be stringently applied to all developments along the routes identified as already experiencing congestion in SWDP 4.⁸⁶
- viii) Kempsey Parish Council has serious concerns that the process for accounting for likely impacts on the M5 will be handled by developers⁸⁷ and not in conjunction with the Highways Agency and the County Council. District level planners are both unable to identify a suitable funding source for improvements to the M5 and are also unable to provide evidence of why such development should proceed in the local area if such funding and road improvements are not forthcoming. Kempsey Parish Council requires that the three district councils assist the County Council as the highways authority to undertake a full traffic modelling and analysis of the effect of the 2450 housing development to the south of Worcester. Furthermore Kempsey Parish council demands that the sources of funding for infrastructure and the timing of that funding (associated with the Community Infrastructure Levy and other sources) be clarified before the SWDP plan and proposals are finalised.
- ix) Kempsey Parish Council strongly supports the construction of the section of highway to the west of Worcester that would complete the connection between the Northern and Southern Link roads which would give Worcester and Malvern much more flexibility for the future and would ease the current saturation point, as referenced in SWDP 3. The Local Transport Plan (3) states that the cost of completing the northern link road would be £150 million,⁸⁸ but Kempsey Parish Council feels that in the longer term this would be by far the more sustainable option for the City and South Worcestershire as a

⁸² SWDP 4, page 52, paragraph 4.60.

⁸³ SWDP 50, page 229 onwards.

⁸⁴ SWDP4, page 49, paragraph 4.47.

⁸⁵ As the SWDP is described in its own ‘Foreword’

⁸⁶ SWDP 4, page 47, paragraph 4.38.

⁸⁷ SWDP 4, page 53, paragraph 4.63.

⁸⁸ Local Transport Plan: www.worcestershire.gov.uk/LTP3

whole. If the northern link road was completed, local businesses would be able to access the west of Worcester much more efficiently (thereby reducing pollution and road congestion), commuters from Malvern to Droitwich Spa and the West Midlands conurbation would be able to travel direct and not hinder the flow of traffic to the south of the city. Once this was completed, it would no longer be necessary to dual the southern link road between Powick and the Ketch – a far better solution as well in terms of the view to and from the Malvern Hills.

- x) The additional traffic that 2450 houses will add to the already very busy A38 both north and south through the village of Kempsey is unacceptable to our community. The A38 already acts as an official relief road for the M5 and is regularly close to capacity. Kempsey Parish Council is extremely concerned about the detrimental impact that the significant increase in vehicular traffic will have on the A38 and on Kempsey village in terms of speed, congestion, safety and pollution.

SWDP 8 – Site Allocations – Urban Areas: Directions For Growth Outside The City boundary

- i) SWDP 8 sets out the justification for directing growth outside Worcester City's boundary, in particular at the Broomhall site to the north of Kempsey Parish.
- ii) Under current proposals within the SWDP, 62%⁸⁹ of the proposed urban extensions for Worcester will fall upon Kempsey Parish. Whilst the SWDP continually refers to the new settlement at Broomhall/Norton as an urban extension of Worcester (and all the relevant SWDP policies focus on this point), it is nonetheless true that this is a major encroachment of Kempsey Parish and that the same parish will be split into two disparate communities - the existing village to the south and the proposed Broomhall development to the north. Both of these communities would fall under a single parish council administration. Such proposals are entirely contrary to SWDP 3,⁹⁰ will not create an inclusive community and will result in a new settlement that would be entirely separated from immediate surroundings and existing local communities. Indeed the two communities would have very diverse and different requirements – making administration particularly difficult and with the proposed new community at Broomhall having the potential to jeopardise the long term viability of the existing Kempsey village on multiple levels. If the principles within the SWDP are to be met,⁹¹ then the housing numbers allocated to the Broomhall site in Kempsey Parish need to be significantly reduced and Kempsey Parish Council demands that this re-evaluation proceed before the SWDP plan and proposals are finalised.
- iii) At a basic administrative level, the 2:1 representational majority that the proposed Broomhall community would theoretically have, would result in Kempsey village being unable to benefit from any increased precept, since the increased budget would by necessity go to the majority development at

⁸⁹ SWDP 8/1, page 76, paragraph 5.37

⁹⁰ SWDP 3, page 46, principle 7.

⁹¹ Particularly Vision Objective "Economic Success that is shared by all" Objective 2, page 26, paragraph 3.6 AND SWDP 1, Development Principles 3, 5 and 9, pages 29 and 30, paragraph 4.2.

Broomhall.⁹² From a more serious perspective, the proposed development would compromise the ability of Kempsey village to grow and remain viable in the long term and ultimately would compromise the ability of future generations to meet their own needs as a village community. Community survey work⁹³ suggests that the existing community does not have a requirement for large scale additional housing, but does require assistance with the gradual and sustainable growth of the village. This is demonstrated by the indication of the range of additional services/facilities that are required⁹⁴ and in the requirement for a small number of additional houses within the village that will allow downsizing and will also allow children to leave home and yet remain in the village.⁹⁵ Sustainable growth also requires assistance in ensuring the long term viability of existing businesses in the parish and in improving the infrastructure and IT links to the wider area.

- iv) Kempsey Parish Council believes that it is unsustainable for the parish to accommodate 2450 dwellings and 20 hectares of industrial land⁹⁶ – the scale of which would represent a 185% increase of development over the size of the current parish. Instead of accepting the present allocation, which would as previously mentioned, create a dominant settlement to the north of the parish, Kempsey Parish Council seeks to promote sustainable development in Kempsey village itself and to encourage controlled growth on previously identified sites within the immediate environs of the village. To this extent the Parish Council has formed a commitment to develop a Neighbourhood Plan.
- v) The proposed development within the village of Kempsey is broadly supported by Kempsey Parish Council on the basis of this being in line with the Kempsey Parish Housing Needs Survey (HNS) carried out in 2009.⁹⁷ It should also be noted that there are other sites to the east of the village that are currently less productive agricultural land that have the potential to also address the housing needs of the village. Kempsey Parish Council would support further analysis to determine whether this would be a viable alternative if objections arise regarding the land currently allocated for housing within the village.
- vi) The HNS; current anecdotal evidence;⁹⁸ and the recent community survey,⁹⁹ indicates a requirement for between 90 and 150 homes: 30 – 50 of which would need to be affordable - mainly for young people trying to get on the housing ladder, but also for some elderly residents wishing to downsize. The Parish Council would strongly support measures to give priority to younger residents and returning former residents over applicants for these homes from outside Kempsey and requires that the current rules for prioritising those with a local connection are maintained.

⁹² Furthermore it is unlikely that Kempsey village would derive maximum benefit from S106 agreement contributions or from the Community Infrastructure Levy generated by any development to the north of the parish.

⁹³ SGIRA Survey Appendix 4

⁹⁴ SGIRA Survey Appendix 4

⁹⁵ SGIRA Survey Appendix 4

⁹⁶ SWDP 1, page 80

⁹⁷ Kempsey Parish Council Housing Need Survey 2009: <http://www.sgira.co.uk/rss--swjcs.html> (Document 10)

⁹⁸ Evidence contained within the current Kempsey Parish Plan and being incorporated within the forthcoming updated Kempsey Parish plan and within the forthcoming Kempsey Parish Neighbourhood Plan.
<http://www.kempseyhub.co.uk/about-kempsey/the-parish-plan.html>

⁹⁹ SGIRA Survey Appendix 4

- vii) The entire allocation for the Village is based upon the analysis that Kempsey is a Category 1 village. Whilst the Parish Council supports the allocation of 133 houses to the village, it is believed that the village classification should not be taken as an indication that the community is sufficiently robust enough to allow it to successfully assimilate an entire new settlement and industrial estate to the north of the parish. The initial case for Kempsey being classified as a Category 1 village was based on work carried out 10 years ago, pre recession, when the village had two general stores, post-office, hairdressers and a hardware store. This is no longer the case, and whilst the local sense of identity remains strong, much work is being championed by the Parish Council to try to enable the village to re-establish the physical centre of the community. The village has already lost many of its amenities through no fault of its own (e.g. the post office) and efforts to try to re-instate these will be undermined by the SWDP in its present format, since the entire focus of the parish will move to the proposed Broomhall extension.
- viii) Better facilities (IT / Broadband) are required in the village to encourage smaller businesses to locate here and once in place these additional facilities will also serve to sustain the 77 existing businesses in the local area. However, the current SWDP will ultimately harm many of these services by diverting resources to the extreme north of the parish.
- ix) Kempsey Parish Council feels that the overall industrial requirement of 309 hectares identified within the SWDP appears to be too large when the current need is low and where no accompanying specific land or job targets have been identified within the plan. Concerning the specific allocation for 20 hectares of industrial land to the north of the parish, Kempsey Parish Council feels that this is entirely inappropriate on this green field site. The Parish Council requires to see the evidence of this supposed demand and that the industrial units will be occupied before this allocation is taken into account at the next stage of the SWDP consultation. The SWDP states that 60 % of the projected population growth is within the over 75's who do not work.¹⁰⁰ On this basis Kempsey Parish Council questions the need for all this industrial land in South Worcestershire, particularly when it is considered that many existing Worcester city centre sites remain unoccupied.
- x) Further concerns relate to the type of industry that would be likely to occupy this proposed site. Unless stringent processes are put in place to restrict the type of businesses that would locate in the proposed site to the north of Kempsey Parish, it is likely that the industries that would move in would be mostly warehouse based, bringing few high paid jobs to the parish. The incoming jobs would almost certainly not assist local people to afford to buy the houses that would be built in the proposed extension or in the village itself. Therefore it is important that work is undertaken to encourage high-tech industries to the parish. Overall Kempsey Parish Council has no objections to encouraging rural employment and developing rural employment opportunities, but these must be sympathetic to the existing environment and sustainable for the parish in the long term.

¹⁰⁰ SWDP 1, page 17, table 1

- x i) A further concern with regard to job provision (in association with any housing development to the south of Worcester) is the fact that Worcester City does not have sufficient employment opportunities to furnish the needs of households on the proposed development. The proposed 20 hectares of employment land would by no means provide sufficient jobs if 2450 houses are built on the proposed Broomhall/Norton site. Indeed, if completed, the majority of new homes on this site will be owned and inhabited by people commuting out of Worcester to Birmingham and sites along the M42 and M40 corridor. These proposals are therefore not sustainable for South Worcestershire or for Kempsey Parish and will in fact encourage commuting as previously mentioned.
- x ii) The reasoned justification within SWDP 8 for expansion to the south of Worcester includes arguments that development cannot proceed to the east of the city because the M5 junctions cannot cope with additional levels of traffic. Kempsey Parish Council believes that the difference between focusing development to the east or to the south of the city is minimal in terms of impact on M5 junctions 6 and 7. However it is felt that the business community's preference for the east (as referenced in the SWDP itself¹⁰¹) should not be overlooked. Locating industries to the east of the city will reduce the requirement for increased road capacity on the A4440 southern link road. Any such industrial site located on the east side would have direct and easily accessible links to both junctions 6 and 7 of the M5 motorway.
- x iii) Accompanying the locating of industry to the east of the city, a suitable number of homes should be built to serve the new businesses, thereby reducing the need for commuting. Kempsey Parish Council requires that additional analyses be undertaken in order for suitable sites to the east of Worcester to be identified so that such homes would not be affected by noise and air pollution. The current existence of homes on these sites, some closer to the M5 than the current spaces available, suggest that this is an entirely viable solution.
- x iv) Kempsey Parish Council also requires that work be undertaken to re-examine the viability of placing additional allocations to the east of Worcester as, it is understood, has also been argued by the business sector itself.¹⁰² Locating additional development here would reduce the distance that transport would need to travel to reach the M5. Additionally, work should be undertaken to re-evaluate the housing allocations to the west of Worcester, which is considered by Kempsey Parish Council to be too low, when it is considered that the west of the city is currently served by good bus routes and has a shorter travel time to the city centre than from the south.¹⁰³
- x v) Kempsey Parish Council is opposed to any extension to the south of the Industrial area that lies to the west of the A38 at Clerkenleap. There is adequate infill within the existing area for some additional business use without imposing further development within the significant gap.

¹⁰¹ SWDP 8, page 73, paragraph 5.25.

¹⁰² SWDP 8, page 73, paragraph 5.25.

¹⁰³ Kempsey Parish Council working Party estimates that travel time from the south to the city centre is 18 minutes, whilst from the west and east the average travel time to the city centre is 12 minutes only.

- xvi) Kempsey Parish Council requires that the potential for additional development to take place to the west of Worcester be explored. It is felt that the benefits of these are:
- To reduce the likelihood of habitation of such new homes by those looking to commute to the West Midlands, Cheltenham, Gloucester and Bristol.
 - To service the needs of both Worcester and Malvern without unduly impacting on the M5 and without adding to the current saturation point being experienced along the A4440 southern link road.
 - The associated improvements to infrastructure by completing the western section of the link road will also offer further opportunities for development beyond the plan period, and again thereby ease the current situation in respect of the A4440 to the south beyond Powick as referenced in SWDP 3. In addition, the potential for additional industrial and housing development alongside the new university development site should be explored, particularly at the Crown East and Dines Green areas, where opportunities for specialised employment are planned.
- xvii) The additional traffic that 2450 houses will add to the already very busy A38 both north and south through the village of Kempsey is unacceptable to our community. The A38 already acts as an official relief road for the M5 and regularly close to capacity. Kempsey Parish Council is extremely concerned about the detrimental impact that the significant increase in vehicular traffic will have on the A38 and on Kempsey village in terms of speed, congestion, safety and pollution.
- xviii) The development to the south of Worcester on the Broomhall site threatens to impinge upon the rural nature of the Area. Kempsey Parish Council feels that there are adequate sites within the city boundary that should be re-explored for use as part of the housing allocation. Spreading additional housing within the Worcester City boundary would not significantly impact upon the rural nature of the city as referenced in SWDP 8.¹⁰⁴
- xix) The Broomhall site is the location of a number of small tributaries to the River Severn, the most important of which is the Hatfield Brook. This river has suffered several flooding events in recent years and Kempsey Parish Council has serious concerns over whether the proposed development site will cope with large scale additional housing without significantly affecting flood risk in the local area. The recent 2007 flood event was caused by a combination of the overflowing of the Hatfield Brook and significant surface run off (in part contributed to by previous significant building works to Norton Barracks) – any additional development in the parish must not exacerbate the risk of a similar event.
- xx) Successful recent work led by FLAG (Kempsey Flood Action Group) to install new flood defences in the parish should not be used as evidence that additional development is now appropriate to the area, since the new flood defences are only designed to cope with existing fluctuations in watercourse levels

¹⁰⁴ SWDP 8, page 74, paragraph 5.31

and known levels of surface runoff. Kempsey Parish Council requires assurances that the necessary steps will be taken to protect the integrity of the flood alleviation scheme in Kempsey.

- xxi) It is understood that part of the proposed Broomhall extension will be located on land that was previously used for landfill. Kempsey Parish Council will require written assurances that no housing development will take place on that land.
- xxii) Ultimately under these proposals,¹⁰⁵ a precedence will be set and Kempsey Parish will be absorbed within the urban extensions and will be lost. The reduction of the significant gap is a visible manifestation of this fate for the village. The statement in SWDP 1¹⁰⁶ that significant gaps cannot be guaranteed in the longer term, ultimately means that Kempsey village is within one generation of coalescence and that Kempsey Parish as a rural community will cease to be. We believe that the existing significant gap to the north of the parish as shown in the current MHDC local plan¹⁰⁷ should be maintained in full to meet the requirements of SWDP 3 and SWDP 43. The SWDP aims to avoid coalescence of communities but this will not be achieved if the plan goes ahead in its present format. Kempsey Parish Council believes that there is a serious case for a full review of green belt land and significant gaps to be conducted and notes that Malvern Hills District Council has already requested that this process be undertaken in its response to the draft National Planning Policy Framework.¹⁰⁸
- xxiii) The proposed Broomhall development will cover an area that will reduce the current significant gap by 50%. The land that may be lost to the proposed urban extension contains many historic hedgerows,¹⁰⁹ the line of the Roman road from Worcester to Gloucester, medieval farming features and, as previously mentioned, many watercourses that are vulnerable to flooding. Halving the amount of green space between the city edge and Kempsey village is not acceptable, and does not support the objective to preserve a “better environment for today and tomorrow”.¹¹⁰
- xxiv) The current SWDP proposals will not safeguard the natural and built environment¹¹¹ that makes Kempsey Parish home to its residents and of conservational importance to South Worcestershire and will not assist the community maintaining its historic character first established over 2,000 years ago. Not only is the current proposed housing allocation contrary to the overarching “Sustainable Development Principles” set out in SWDP 3,¹¹² it also fundamentally contradicts the design principles

¹⁰⁵ Specifically, the SWDP proposal to insert of 2450 houses to the north of the parish and the lack of guaranteed protection for the remaining significant gap beyond the SWDP plan period. SWDP1, page 30, Development Strategy Principle 10.

¹⁰⁶ SWDP 1, page 30, principle 10.

¹⁰⁷ Malvern Hills District Council Local Plan 2006 – 2009 (NB The Local Plan version that predates the Saved Policy decision). <http://www.malvern hills.gov.uk/cms/planning-and-the-environment/development-plans/local-plan.aspx>

¹⁰⁸ Page 2 of the MHDC response to the National Planning Policy Framework, dated 28th September 2011 submitted to Mr Alan Scott, Communities and Local Government. Appendix 2.

¹⁰⁹ Campaign to Protect Rural England “Preliminary study on the survival of historic hedgerow boundary features to the south of Worcester city” 2011. <http://www.sgira.co.uk/cpre-hedgerows-report.html>

¹¹⁰ SWDP 8/1, page 76, paragraph 5.38 does not support Vision Objective “A better environment for today and tomorrow”, page 27.

¹¹¹ SWDP 3, page 46, principle 6

¹¹² SWDP 3, page 44 onwards.

with SWDP 26.¹¹³ The proposed development will not enhance and conserve the existing landscape character, and will not protect the individual character of the settlement of Kempsey.

- xxv) The proposed site of the Broomhall development has a distinctive rural/countryside character with remnant hedgerow patterns, as identified in a recent CPRE hedgerow study,¹¹⁴ and important watercourse habitats, all described as important landscape features in SWDP 43.¹¹⁵ In addition to this, they provide “a visual break for local communities and so it is important that they are protected and enhanced.”¹¹⁶ Added to this is the inherent conflict between the assumed requirement for expansion of urban areas and the fact that this expansion is being proposed on prime agricultural land. Provision of additional employment should not jeopardise future agricultural production. (ie replacing agricultural land with industrial units is not a progression for the local area).
- xxvi) Damage to this site and the re-creation of a false buffer environment in order to compensate for the loss of the original land, would not meet the new planning framework,¹¹⁷ which states that planning should not only protect biodiversity but also improve it. This plan has the opposite effect and therefore is not sustainable.
- xxvii) Kempsey Parish Council has serious concerns that the proposed development does not give appropriate assurances regarding new and additional services that will be provided in the parish. Beyond reducing the long term viability of existing businesses and facilities in Kempsey village, the plans do not provide adequate guarantee that services that are in demand, such as a primary and secondary school, will be provided. Experience has shown, as with the St Peters development, that schools are often promised as part of development proposals, but are not forthcoming. Should this development site go ahead, Kempsey Parish Council would request that stringent requirements are put in place to ensure that adequate educational facilities are completed by the end of the plan period. Besides the fact that some facilities were not forthcoming, it is also understood that the development at St Peters provided facilities in different locations to those originally promised, resulting in unplanned for traffic flows through the housing estate.
- xxviii) Since there is no indication that new secondary schools will be provided during the plan period, Kempsey Parish Council requires that full modelling should take place with regard to school allocations, in order to work out the school places required over the period of the SWDP. This modelling should take place before the SWDP plan and proposals are finalised.

SWDP 26 – Sustainable and Prosperous Communities: Design

¹¹³ SWDP 26, Design Principle D, page 152, paragraph 17.1.

¹¹⁴ Campaign to Protect Rural England “Preliminary study on the survival of historic hedgerow boundary features to the south of Worcester city” 2011. <http://www.sgira.co.uk/cpre-hedgerows-report.html>

¹¹⁵ SWDP 43 ‘Local Green Networks’, page 205, paragraph 25.3

¹¹⁶ SWDP 43, page 206, paragraph 25.8.

¹¹⁷ Draft national planning policy framework www.communities.gov.uk page 9 of the “easy to read summary”.

- i) SWDP 26 Design sets the design standards that must be inherent to all planning as part of the SWDP, if residents' quality of lives are to be maintained, and if the special character of South Worcestershire is to be enhanced.¹¹⁸ With reference to design principal D¹¹⁹ "scale form and massing", the SWDP requires that development must be appropriate to the setting of the site and surrounding landscape area. Kempsey Parish Council feels that 2450 homes, plus 20 hectares of industrial development and a park and ride are not appropriate to this setting and therefore the proposal for this site cannot go ahead in its present format.
- ii) The current SWDP proposals will not safeguard the natural and built environment¹²⁰ that makes Kempsey Parish home to its residents and of conservational importance to South Worcestershire and will not assist the community maintaining its historic character first established over 2,000 years ago. Not only is the current proposed housing allocation contrary to the overarching "Sustainable Development Principles" set out in SWDP 3,¹²¹ it also fundamentally contradicts the design principles within SWDP 26.¹²² The proposed development will not enhance and conserve the existing landscape character, and will not protect the individual character of the settlement of Kempsey. Kempsey Parish Council demands that the proposed housing allocation for the Broomhall site be fundamentally re-examined on this basis.
- iii) The proposed site of the Broomhall development has a distinctive rural/countryside character with remnant hedgerow patterns, as identified in a recent CPRE hedgerow study,¹²³ and important watercourse habitats, all described as important landscape features in SWDP 43¹²⁴. In addition to this, they provide "a visual break for local communities and so it is important that they are protected and enhanced."¹²⁵ Added to this is the inherent conflict between the assumed requirement for expansion of urban areas and the fact that this expansion is being proposed on prime agricultural land. Provision of additional employment should not jeopardise future agricultural production and it should be noted that replacing agricultural land with industrial units is not a progression for the local area.
- iv) With reference to Design Principal B¹²⁶ there is a requirement to consider the relationship between surroundings and new developments, Kempsey Parish Council requires that serious consideration is given to how the views from A38 across to Whittington will be maintained. Crookbarrow Hill is an important landmark to local residents and views of this should also be protected.

¹¹⁸ SWDP 26 Design, pages 149, paragraph 17.1 & page 150 paragraph 17.4

¹¹⁹ Page 152

¹²⁰ SWDP 3, page 46, principle 6

¹²¹ SWDP 3, page 44 onwards.

¹²² SWDP 26, Design Principle D, page 152, paragraph 17.1.

¹²³ Campaign to Protect Rural England "Preliminary study on the survival of historic hedgerow boundary features to the south of Worcester city" 2011. <http://www.sgira.co.uk/cpre-hedgerows-report.html>

¹²⁴ SWDP 43 'Local Green Networks', page 205, paragraph 25.3

¹²⁵ SWDP 43, page 206, paragraph 25.8.

¹²⁶ Page 152

- v) At present developers are made to sign an agreement saying that they will look after the green/open spaces in perpetuity. Any such open spaces should be offered to Parish Councils on a first refusal basis, with the option to maintain these with an appropriate committed sum via S106 agreements.

SWDP 31 – Meeting Affordable Housing Needs

- i) SWDP 31 states that the delivery of affordable housing is a significant aim of this proposal. Kempsey Parish council agrees with this sentiment but questions whether a target of 40% affordable housing is achievable given that this is likely to be less profitable and therefore less attractive for developers than more expensive housing. Therefore it is suggested that specific development clauses are inserted at the planning permission stage to guarantee that the specified amount of affordable housing is provided. Further to this, Kempsey Parish Council wish to see an allocation of the affordable and social housing reserved for those with a connection to the parish.
- ii) It has been observed that typically affordable housing is not built until last because of the perception that people do not want to live near the affordable housing and developers do not want to put off customers, meaning that the affordable housing is not available until late on. This mistake is due to be repeated again, as demonstrated in the Phasing Plan of the SWDP.¹²⁷

SWDP 33 – Travellers

- i) SWDP 33 states that additional pitches will be made available within the proposed urban extensions.¹²⁸ This statement is based on evidence used from the regional spatial strategy,¹²⁹ but elsewhere, the document states that the Regional Spatial Strategy is no longer a consideration¹³⁰ and that the government's proposed changes to the planning system have provided the opportunity to closely re-examine the local evidence base and establish their own local development requirements.
- ii) With reference to the proposed Broomhall development, anecdotal evidence suggests that the potential site for these traveller pitches would be placed somewhere along the A4440, but, if this is the site of the old landfill, then this is entirely inappropriate. Kempsey Parish Council would submit that the travellers themselves would not wish to live alongside this busy road and that alternative placement on the site of the proposed development are also not feasible when the impact on the existing environment and the flood defences is considered.

SWDP 36 – Tourism Development

¹²⁷ SWDP 50, page 231, table 25

¹²⁸ SWDP 33, page 181, paragraph 21.43

¹²⁹ SWDP 33, page 179, paragraph 21.37

¹³⁰ Page 11, paragraph 2.2.

- i) The plan is rooted in an economic and housing policy which although laudable in so far as it goes, does not address the wider social and improvement needs of our communities. It is narrowly focussed and does not even start to act as a blueprint for the improvement of tourism and recreation in the local area.
- ii) Worcester City badly needs to exploit their potential to attract tourists, but within the SWDP there is no mention of any planned facility that will enhance the social and cultural life of the city beyond the proposed provision of a major hotel. Tourists flock to Malvern because of its theatre, its concert hall and its clean, appealing aspect. Worcester, by contrast, has a Commandery which is largely empty of artefacts and a battlefield site that has never been developed as a tourist attraction.
- iii) There is a great opportunity to create a cultural centre based in the area of the cathedral and using the former Royal Worcester Porcelain premises. This could incorporate the existing porcelain museum, a relocated and upgraded city museum that tells the story of the city, the regimental gallery and a concert hall to seat 1,000 people.

SWDP 47 – Flood risk management

- i) Kempsey Parish has a serious history of flooding.¹³¹ The Broomhall proposed development site is the location of a number of small tributaries to the River Severn, the most important of which is the Hatfield Brook. This river has suffered several significant flooding events in recent years and Kempsey Parish Council has serious concerns over whether the proposed development site will cope with large scale additional housing without significantly affecting flood risk in the local area. The recent 2007 flood event was caused by a combination of the Hatfield Brook and significant surface runoff –any increase in surface water urn-off from a new development will directly increase the risk of homes in Kempsey Village being flooded.
- ii) Successful recent work led by FLAG (Kempsey Flood Action Group), in conjunction with the hard work of local residents and the Environment Agency and with welcome support from Malvern Hills District Council, has led to the installation of new flood defences The Environment Agency (EA) advises that these flood defences were built for a 1 in 100 year event, were designed with recent major floods in mind and on the basis that flooding could worsen in the future with climate change. The current defences have not therefore been planned with the prospect of several thousand new homes and properties discharging their run-off surface water in to the waterways that feed the Hatfield Brook running through Kempsey.
- iii) Consequently the newly installed flood defences in the parish should not be used as evidence that additional development is now appropriate to the area, since as demonstrated above they are only

¹³¹ Kempsey parish homes flooded in: 1979, 1981, 1988, 1989, twice in 1990, 1992, 1993, 1995, twice in 1998, twice in 1999, 2000, 2002, 2004, four times in 2007, three times in 2008. A38 flooded for several days in 2007 and completely closed to traffic for two days. In all 23 floods in 30 years. Some homes hit 6 times in 12 months (Jan '07—Jan '08). Source Kempsey Flood Action Group. <http://kempseyflag.info/home/>

designed to cope with existing fluctuations in watercourse levels and known levels of surface runoff. The SWDP proposal to build 2450 houses (plus 20 hectares of industrial land) has the serious potential to undermine recent community efforts to ensure that the parish is protected from future flooding. Kempsey Parish Council requires that long term written guarantees are provided in the SWDP that will protect the integrity of the flood alleviation scheme in Kempsey. Specifically that there is an undertaking to address the following:

- i. the run off water from 2450 houses and the industrial units must NOT be directed into soakaways which will affect the water table and therefore the level of the Hatfield Brook, other than that which is sufficient to maintain the water table.
- ii. surface water run-off from the development must drain directly in to the Severn rather than the Hatfield Brook or adjacent flood plains and that this should be a condition of approval for all development in the parish.
- iii. make sure that water courses will be maintained,¹³² effective drainage put in place and anti-flooding promises made at the planning stage are rigorously enforced so that the amount of water entering the Hatfield Brook before and after development is the same.
- iv. the existing defences, including the new bund has been designed using previously experienced flood levels and water flows in the Hatfield Brook, plus an allowance for climate change, must be adequately maintained and utterly protected from damage or interference whilst any housing development progresses.

iv) Kempsey Parish Council also requires that serious consideration be given as to the following:

- i. who will have responsibility for checking the impact of flooding on existing sites, or checking adherences to recommended levels of surface run off.
- ii. who will have responsibility for making sure that the defences will not be overwhelmed by altered flow volumes of run off water into the Hatfield Brook.
- iii. who will ensure that the principles outlined in SWDP 47 will be strictly adhered to by the developers. The current version of the SWDP refers only to adhering to advice and guidance in this respect and here is no statutory obligation to enforce compliance with the points set out in Development and Flood Risk.¹³³

vi) It is understood that park and rides are planned to be built near the Whittington Tump (Crookbarrow Hill) at junction 7 of the M5 and at the Ketch roundabout on the A4440. Kempsey Parish Council is concerned that unless a proper storm drain is built, then surface water run off from this extensive tarmac area, will run downhill and drain into the Hatfield Brook.

¹³² Including banks, stream beds, transient obstructions from debris, fallen trees and any other detritus that ends up in a watercourse.

¹³³ SWDP 47, page 219, paragraph 27.20.

List of Appendices

- 1) CPRE Hedgerow report
- 2) Malvern Hills District Council response to the National Planning Policy Framework consultation dated 28th September 2011 submitted to Mr Alan Scott, Communities and Local Government.
- 3) Malvern Hills District Council Special Council Agenda – Report C300, 5th July 2011
- 4) SGIRA data
- 5) Parish Council comments received from members of the public