Dear sirs,

21 February 2013

South Worcestershire Development Plan
These comments are made in response to the consultation on the above Plan.

Policy SWDP17

A- This paragraph should recognise that the provision to be made will meet the required provision as a minimum.

B- Restricting sites to be within or on the edge of settlements is unrealistic. The recognition that urban extensions can play a part in delivering sites for Gypsies and Travellers is welcomed. Planned provision from the start can ensure that development is integrated and is positive in terms of community cohesion.

C- i – It appears that “local designation” means only Conservation Areas, so it would be logical to use those words. However, no local designations should automatically preclude a Gypsy and Traveller site. Even untidy sites within a Conservation Area might benefit from redevelopment as a Traveller site.

iii – The phrase “any adverse impact” is too restrictive. The phrase “any significant impact” should be used.

iv – The phrase “any adverse visual impact” is too restrictive. The phrase “any significant visual impact” should be used.

ix- This is too restrictive. The phrase used in element Biii of Policy SDWP16 is more appropriate. The difference in approach is discriminatory.

D – This is wholly unacceptable and contrary to National policy. Unmet need cannot be used as a test of acceptability. All applications must be judged against their merits. An acceptable site must be approved irrespective of unmet need.

Policy SWDP21

Paragraph Bv says it applies to “all new development” but cannot reasonably be applied to Gypsy and Traveller sites.

Policy SWDP27

Paragraph Ai says it applies to “all new developments over 100 square metres”. This is ambiguous. Does it relate to changes of use and other operational development or just to buildings? It cannot reasonably be applied to Gypsy and Traveller sites or to many other forms of development. Paragraph Aii raises similar concerns.

Yours faithfully,

A. R. Yarwood