

# **Response by Clifton upon Teme Parish Council to South Worcestershire Development Plan**

This is the response of Clifton upon Teme Parish Council to the Proposed Submission Document of the South Worcestershire Development Plan (SWDP), completed in January 2013. As requested, this response concerns whether the SWDP has been prepared in accordance with legal and procedural requirements, and the extent to which the SWDP is 'sound'.

Clifton upon Teme Parish Council has a number of concerns about several aspects of the SWDP, which are as follows:

1. *The interpretation of strategic priorities.* The National Planning Policy Framework (NPPF) requires local authorities to define 'strategic priorities' in their local plans, including "strategic policies to deliver: the homes and jobs needed in the area..." (Para 156). In the following paragraph (157), the NPPF specifies the contents of local plans, which should "allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate..." The SWDP is in accord with the NPPF in including a comprehensive development strategy (objectives SWDP 1-7), which it distinguishes from individual site allocations (SWDP 43-61). However, a recent communication (enclosed) from the Chief Executive of Malvern Hills District Council (MHDC) to Harriet Baldwin MP indicates that the Council regards all elements of the SWDP (including every single site allocation) as being 'strategic'. This interpretation is contrary to the hierarchy of strategic policies and site allocations specified in the NPPF and the distinction between development strategy and site allocations specified in the SWDP. If implemented, it would have important implications for local councils preparing neighbourhood development plans, restricting them (as argued in the letter) to identifying only additional sites instead of more appropriate sites within the numbers identified in the overall strategic policies.
2. *The failure of the SWDP to identify dispersed housing needs.* The SWDP estimates housing needs for South Worcestershire, with individual allocations for each of the three constituent districts. A single allocation is appropriate for a compact city like Worcester, but not for a widespread rural area such as Malvern Hills District. The latter comprises an irregular banana-shaped area of 222 square miles, stretching from Shropshire to the suburbs of Tewkesbury,

and taking in villages on the Western and Southern outskirts of Worcester City. It is therefore difficult to believe that houses built in Tenbury Wells could ever meet the 'housing needs' of people in Upton-upon-Severn, Malvern, or many of the other smaller communities in the district. Housing needs in Malvern Hills District would be more appropriately analysed in terms of clusters of individual towns and villages. Each such cluster may have distinctive housing needs, resulting from variations in the age-structure of its population and changes in local employment opportunities. Failing to take account of these variations will have the effect of not adequately meeting the needs of some clusters and increased commuting.

3. *Lack of Consultation with Parish Council and Parishiners.* At a recent meeting with over 100 parishioners present, it was obvious that the parishioners of Clifton upon Teme felt that they had not been involved with the selection of the preferred site. Many who attended were not aware of any planned development on the preferred site and were not aware what preferred site is in the Plan.
4. *The concentration of rural housing sites in larger villages.* The SWDP proposes that concentrating rural housing sites in larger villages contributes to the NPPF requirement for sustainable development. The impact of this policy on smaller villages is not discussed. Many villages in England, both large and small, have seen the closure of their shops, schools, post offices, and public houses. It is probable that younger families with children will disproportionately prefer to re-locate to the larger villages which retain their local school. This will result in an increasing proportion of elderly people in the smaller villages. The least-mobile section of the population will therefore be in the places with the fewest accessible services and the poorest transport. The lack of new housing in such villages to meet the needs of the growing number of single-person elderly households means that some elderly people would need to re-locate out of their familiar community. The failure of the SWDP to directly address this growing crisis of rural life is particularly disappointing.
5. *The lack of phasing for new housing.* Although it covers a planning period up to 2030, the SWDP does not include specific proposals for phasing rural housing development in Malvern Hills District on its designated housing sites over the plan period, or for splitting developments in such locations over a number of years. In its present form, the Plan would permit all such sites to be developed simultaneously. Indeed, the increase in the requirement for sustainable homes to Level 6 in 2016 is an incentive for developers to bring forward planning applications to avoid the need to meet these more demanding standards. Lack of phasing has particular implications for rural

communities in which only a small number of new households are formed each year. A large housing estate built in a village at the start of the plan period would therefore accommodate mainly people moving into the village, while the lack of additional housing in subsequent years would deny new households the opportunity to remain in the village. Rural areas therefore need small increments of additional housing designed to meet local needs, rather than estates designed to contribute to a housing target for an entire district.

6. *Site allocations which contradict strategic objectives.* The stated strategy of the SWDP is to give priority to housing on brownfield sites and to oppose development on good agricultural land. It notes that "development that would result in the permanent loss of this high quality land will be refused, unless it can be demonstrated that there is no alternative land of a lower quality that could reasonably be used" (SWDP 13). Yet the SWDP includes an allocation of 51 houses to be built on a single estate in Clifton upon Teme Parish on Grade 2 agricultural land which has never previously been developed and where development has been refused in the past by a planning inspector.
7. *Failure to take into account the impact of rising transport costs.* The price of petrol/litre is now three times that in 1990, with future increases probable. This will make commuting to distant workplaces even less financially attractive than at present, thereby reducing demand for housing in rural areas for people of working age. This may be offset by an increase in the number of people who are able to work from home. The most sustained growth in employment in recent decades has been with small firms working in information technology. The SWDP assumes these will be concentrated in technology parks. But the development of high-speed broadband has made centralised facilities of this kind less important. The SWDP should therefore give greater emphasis to a more dispersed form of employment, including small estates and home-based employment in rural areas. This requires that the expansion of high-speed broadband throughout all rural areas of South Worcestershire should be the main infrastructure priority in the Plan.

Clifton upon Teme Parish Council therefore concludes that the SWDP is not sound in its current form, and that it be amended to include a commitment to neighbourhood planning as an essential part of its implementation. The district councils (in collaboration with local councils) should identify clusters of towns and parishes for Malvern Hills and Wychavon, such that each cluster would be responsible for preparing a neighbourhood development plan. In accord with the Localism Act, each plan would comply with the development strategy of the SWDP, defining 'strategy' in

accord with the NPPF rather than idiosyncratic definition used in the letter to Harriet Baldwin MP from the MHDC chief executive. Each cluster would define local housing needs and appropriate deliverable sites. These would include appropriate developments in smaller as well as larger villages. Cluster plans would address the need to restore facilities and support isolated elderly people in smaller villages. Preference would be given to small developments phased over a number of years, rather than large housing estates built at once in category 1 villages. A model for such neighbourhood plans is provided by the Upper Eden Neighbourhood Development Plan, which has recently been approved by an Independent Examiner.

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