

Draft Lower Broadheath Community Plan 2013

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Chairman’s Letter of Introduction.

Lower Broadheath Community Plan 2013 – Consultation Document.

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Lower Broadheath Parish Council

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To Residents

28th March 2013

Dear Resident,

Consultation Document for the Draft Community Plan 2013

Members of the Community Plan Steering Group have now completed their work on this draft document, but before I recommend it for adoption to the Parish Council, hopefully in June 2013 I should like to give you the opportunity to comment on the various issues discussed. Whilst I think we all accept that some development is inevitable the responses to the 'Community Plan Questionnaire January 2013' make it quite clear that any further development over and above that included in the South Worcestershire Development Plan proposals would not be acceptable.

Clearly the infrastructure proposals (highways network, health care facilities etc.) are inadequate to support this development and the Parish Council will continue to argue for improvements using the Community Plan to demonstrate your concerns and hopefully achieve the support of our District and County Council elected representatives. Developers will no doubt press for even greater numbers of homes, and if successful, without substantial improvements to the infrastructure will lead to an 'unsustainable' future for South Worcestershire.

The Community Plan attempts to address these issues but if you would like to comment on any issue please contact the Clerk to the Council by letter or email as soon as possible. Finally I should like to thank all of you that responded to the Questionnaire, without your support we cannot expect our voices to be heard!

Please let me have any comments you may wish to make on this plan by the end of April.

Yours sincerely

Barbara Beard

Barbara Beard

Chairman of Lower Broadheath Parish Council



Lower Broadheath Community

Plan 2013

Consultation Document

1.0 The Need for a Community Plan.

1.1 Introduction:

Malvern Hills District Council, Worcester City and Wychavon District Councils have been working together for some years to prepare their future 'Local Plans' to meet the considerable increase in population expected up to 2030. It has been feared since 2006 that the projected need to build up to 25,500 homes identified in the Regional Spatial Strategy (RSS) for South Worcestershire was bound to have a significant impact on the village and parish.

The Labour government encouraged communities to get involved in the process by preparing 'Parish Plans' to represent the views of the community and these were funded by Defra. Under the guidance of the Parish Council, Lower Broadheath produced its own plan in 2007 and when more information became available regarding the scale of development proposed for the parish a further 'Plan Update' was produced in 2010.

The feedback received via questionnaires and work produced by a steering group enabled the Parish Council to argue that the proposal to build 3,500 homes in the parish to meet Worcester City's need, plus further homes to meet Malvern Hills need was totally unacceptable. These documents also helped the District Councillors to argue for and achieve a reduction in numbers for the parish.

The 'Localism Act' introduced by the Coalition Government in 2011 encourages communities to produce a 'Neighbourhood Plan' (N.P.). The intention was to influence future planning in their area. Further investigation revealed that a N.P. could only deal with land usage issues and could not be used to argue for a lower number of homes than identified in the South Worcestershire Development Plan (S.W.D.P). Furthermore it could not deal with infrastructure issues considered so important to make the plan sustainable. Whilst a N.P. is a statutory document, **because of its limited scope, the Parish Council has agreed instead to produce a Community Plan (C.P.)** which will in effect be an updated version of the 'Parish Plans' which have proved to be effective in the past and that is what this document is!

The 'Localism Act' scrapped the 'Regional Spatial Strategy' (R.S.S.) but again encouraged local authorities to work together to produce 'cross boundary' development plans. The three authorities having undertaken further public consultation have now produced a 'Draft S.W.D.P.'. The current proposal is for some 23,200 new homes and approx. 280 h/a of employment land in South Worcestershire. This was adopted in final draft form in December 2012 by the three District Councils for submission to the Department of Communities and Local Government. It will be subjected to an Examination in Public (E.I.P.) later this year and, if approved, it will become the formal 'Local Plan' in late 2013.



The 'schedule of changes' to the S.W.D.P. submitted to the three Councils in July 2012 and approved in December 2012 indicates the following impact upon Lower Broadheath:

1. Fifty two (52) new homes are scheduled to be built within the village.
2. It is proposed that Nine Hundred and Seventy Five (975) homes be built in this and the parish of Rushwick. These homes together with a Gypsy and Travellers site are scheduled to be located against the western boundary of Worcester City adjacent to Dines Green. The development is to be known as Temple Laugherne. A further c150 homes are already under construction at Earls Court Farm. An employment site of 11 hectares at Grove Farm has been designated for a Health Care Facility together with further accommodation for the University.
3. A phased delivery of Five hectares of employment land will be provided on the Temple Laugherne site.

1.2 The Scope and Justification for the production of a Community Plan. (C.P.)

By means of a C.P, we shall seek to influence the planning of new homes in the village for the benefit of the community, rather than have schemes forced upon us by developers who may only be influenced by profit and a desire to use their standard urban designs. The cost of any new homes is also seen to be of considerable importance by the community as evidenced by the Housing Need Survey (See Parish Plan Update 2010). The 975 homes and gypsy site planned as part of the Worcester City expansion (Temple Laugherne) will also be considered as part of the C.P. and its likely impact on the village. The aim of the C.P. will be to ensure a 'sustainable environment' for all present and future generations. An Infrastructure Needs Study, which forms an important part of Sustainability, will include:

1. Highways and Transportation.
2. Flooding, Drainage and Global Warming.
3. Hospital and Health Care.
4. Education.
5. Employment.
6. Leisure facilities.
7. Environmental issues.
8. Broadband.
9. Measures to establish and preserve a 'significant gap' between the village and Worcester.

Much of the evidence obtained in the 'Parish Plan Update 2010' is sufficiently current to enable its inclusion in this document, but some of that obtained in the 2007 plan has been reviewed in the 'Community Consultation Questionnaire', January 2013, and its findings, (see Appendix 1) has been considered in the C.P.

The C.P. makes recommendations with respect to the types of homes, their design, layout and ecological issues considered desirable based on the evidence obtained in the

questionnaire described above, from the 'Housing Need Survey' undertaken as part of the 'Parish Plan Update 2010' and the 'Village Design Statement' published in April 2008.

Drawings showing the parish boundary, the area of the C.P. study and the suggested line of a possible future North-West Flood Relief road (NWFRR) are included in this document below. The location of all sites selected for development is also shown.

1.3 The Community Plan Consultation:

The C.P. is administered by the Parish Council with support from the findings of the 'Community Plan Questionnaire January 2013', which was distributed to all households in the parish. This received a response of 29%. Further consultation will take place via this draft plan before its final adoption by the Parish Council and can be viewed on the Parish Council Website, Post Office or by appointment at the homes of the Chair and Vice Chairman of the Parish Council.

The following organisations will also been consulted:

- *The Gardening Club.*
- *Women's institute*
- *Church*
- *Youth Club*
- *Land owners (Where known)*
- *Shop and Post Office*
- *Broadheath C of E Primary School*
- *Public Houses*



1.4 Election of Officers:

The Steering Group comprises of members of the Parish Council, and the Parish Council will also lead in the production of the Community Plan, it has an elected Chairman a Vice Chairman, Secretary and any other Officers considered necessary for its production.

1.5 Voting rights:

All members of the Steering Group have voting rights with a chairman's casting vote if required. All strategic issues will be voted upon with the majority carrying or rejecting the proposal.

1.6 Declaration of Interest:

Land owners must disclose their pecuniary interest when making comments and acknowledge that the C.P. is subservient to the forthcoming 'Local Plan'. Land owners are reminded that any views expressed by the 'steering group' are informal at this stage and may not be adopted by the Parish Council. They may reserve the right to object to any recommendations made through the normal process but should not use their objections to hinder the work of the C.P. Steering Group.

1.7 The consideration of possible additional sites suitable for development:

Whilst the S.W.D.P has identified some sites as being suitable for development, the Steering Group will consider possible additional sites for development if there is a view expressed in the 'Community Plan Questionnaire January 2013' (see findings below) that even more homes are needed.

1.8 Community Infrastructure Levy (C.I.L):

Local Authorities receive contributions from Developers and Central Government for each new home that is built in their area to encourage 'sustainable development'. These monies, which come from C.I.L's, New Homes Bonus, Council Tax benefits and Section 106 Planning Gain contributions can be used to help fund a variety of activities such as affordable housing, highways, education etc. for the benefit of the community. Bodies such as Parish Councils may apply for some of this money to be used to improve communal facilities. The C.P will look at ways of applying for this money to make improvements in the village.

1.9 Consultation:

Whilst public consultation has taken place via the questionnaire January 2013 further consultation as previously stated will take place as described before the C.P.'s adoption.

1.10 Adoption:

Subject to acceptance by the community, the C.P. will be adopted by Lower Broadheath Parish Council. It is not a statutory document but will be helpful to the Parish Council when being consulted over planning applications. It is hoped it will also be helpful to Land Owners, Planning Officers, District Council Members and Developers in the considering any proposals within the parish.

1.11 Time Table:

The completion of the draft C.P is anticipated to be in March 2013 with adoption by the Parish Council in June 2013.

1.12 Cost of Developing the Plan.

The cost involved in developing the plan will be met from the Parish Council reserves. The cost will be considerably less than for producing a Neighbourhood Plan and the benefits are believed to outweigh the production of a N.P. at this stage for the reasons stated. However, such a document may be produced in the future if it is felt that it would be of benefit to the community.

2.0 HOUSING

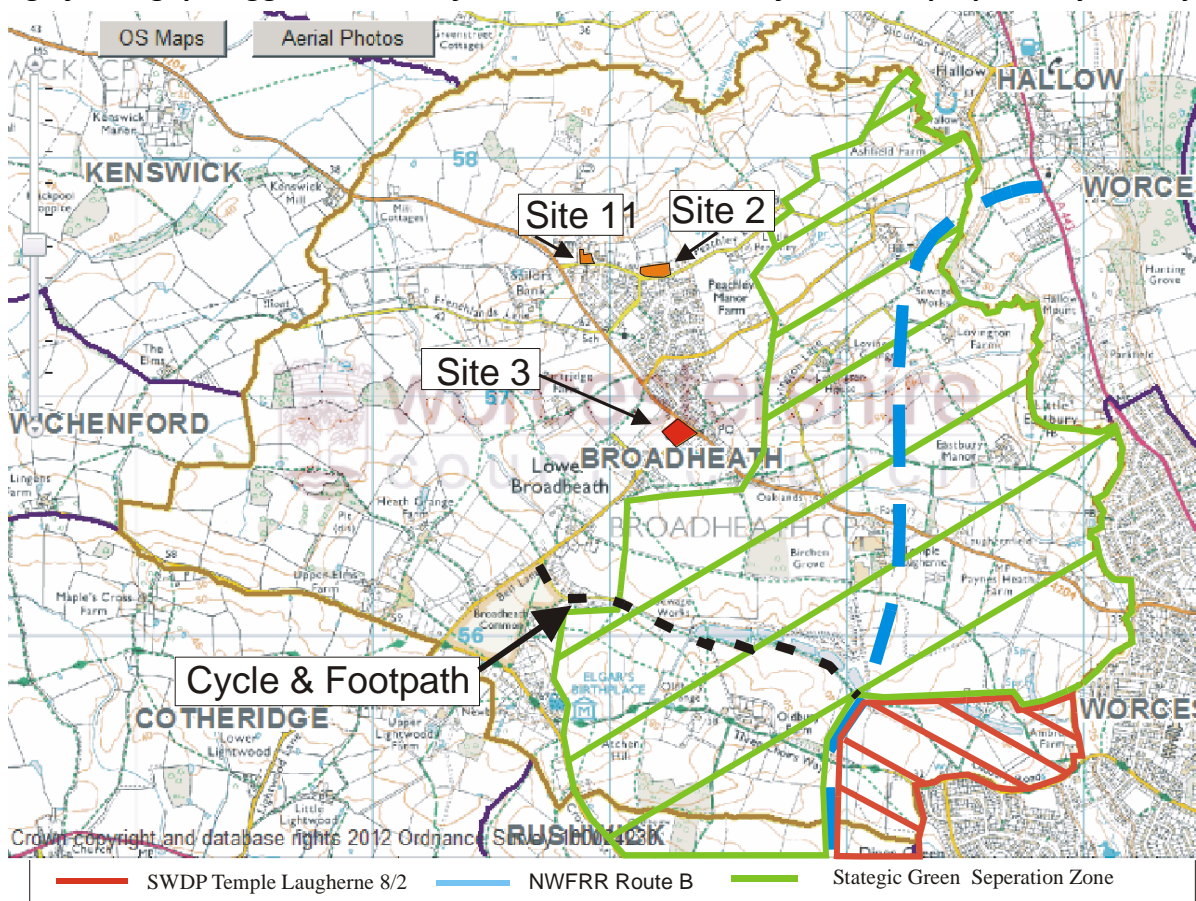
2.1 Introduction:

The number and type of housing required by the S.W.D.P. for the village is of most importance in preparing the Community Plan. The Plan is influenced by the S.W.D.P. This has identified certain sites and dwelling numbers as follows:

- Peachley Court Farm, Peachley Lane – 6 dwellings (site 1)
- Strand Cottages, Peachley Lane – 6 dwellings (site 2)
- Martley Road/Bell Lane junction – 40 dwellings (site 3)

Total: 52 dwellings

Map, showing Parish boundary in Brown, with proposed development sites within SWDP, significant gap, suggested route of North West Flood Relief Road and proposed Cycle Way



- A further 975 homes together with a Travellers site has been identified in the S.W.D.P. to be built partly in this and the adjoining parish of Rushwick at Temple Laugherne as discussed below.

The S.W.D.P. indicates the range of housing types (i.e. size of dwelling) needed to serve the geographical area of South Worcestershire but this does not correspond with the evidence obtained for Lower Broadheath in the 'Housing Need' survey undertaken as part of the Parish Plan Update 2010. The findings of this survey are as follows (evidence shown in Appendix 2) and these must be considered more reliable.

The SWDP indicates that 40% of homes on any development of 15 or more dwellings should be Affordable (i.e. rented or shared ownership), on sites of 10-14 dwellings 30%, and 20% on sites of 5 to 9 dwellings. Assuming that 52 homes are considered acceptable in the village this equates to 34 open market and 18 Affordable homes in Lower Broadheath (based on the sites included in the S.W.D.P).

No attempt has been made to investigate the need or the range of housing types required for the 975 homes to be built in this parish and the adjoining parish of Rushwick near to Dines Green and Earls Court Farm and on the boundary of Worcester City, the majority of which are to serve their need. Furthermore no attempt has been made to justify the need for the gypsy/travellers site in the same location, known as Temple Laugherne.

The Housing Need survey undertaken in 2010 as part of that parish plan indicated the following need within the village:

- Rented accommodation 50% 2 bedroom bungalows/houses/flats.
 - Rented accommodation 50% 3 bedroom houses.
 - Shared ownership 50% 2 bedroom bungalows/houses/flats.
 - Shared ownership 50% 3 bedroom houses.
- | | |
|------------|-----------|
| 2 beds | 9 |
| 3 beds | 9 |
| Affordable | <u>18</u> |
-
- Open market 60.66% 3 bedroom houses. 21
 - Open market 18.02% 4 bedroom houses. 6
 - Open market 9.84% 3-4 bedroom bungalows/flats. 3
 - * Open market 11.48% 1 to 4 person houses/ bungalows/flats. 4
- | | |
|-------------|-----------|
| Open Market | <u>34</u> |
|-------------|-----------|

* This range of dwelling sizes has simply been identified as small units to allow flexibility to developers.

2.2 Site Sustainability and Viability:

The C.P intention was to investigate the sustainability and viability of any additional sites that may be identified in the village in responses to the 'Questionnaire January 2013', together with sites that local knowledge may suggest are worthy of consideration. Sites rejected by the 'Strategic Land Availability' Study will not be revisited. In assessing the various sites the following factors need to be considered.

1. Is the site likely to promote support from the community?
Is the site identified in the SWDP as being suitable for development?
2. Are the land owners prepared to allow development?
3. Is the site a brownfield site?
4. Are there any issues with land contamination?
5. Is development economic?
6. Are main electric, gas, water, telephone and mobile phone reception available?
7. Is the site close to an adopted highway?
8. Are there any public footpaths crossing the site, or trees with T.P.O.s?
9. Is main foul drainage available?
10. Is storm drainage available?
11. Is the site within 1km of a shop, post office, pre-school, primary school, place of worship, health care facilities, meetings room, pub, play area/sports field, bus service?
12. Are there any local employment opportunities.

2.3 Economics Led Housing Need:

As with the SWDP the CP should be economics led. House prices should as far as possible reflect what people think they can afford and the indicative prices below are resulting from the 'Housing Need Survey'. The current average local wage is also a consideration but without significant deposits, home ownership is likely to be difficult to achieve for many. Hopefully the 'affordable' element will help those unable to achieve outright purchase.

Not all respondents indicated prices that they could afford, so the figures quoted below only give a guide and are based on 2010 values:

2 - bedroom bungalow/flat/house	Av. £182,000
3 - bedroom house	Av. £222,000
3 - bedroom bungalow	Av. £322,000
4 - bedroom house	Av. £317,000.

However it does indicate that there is little demand within the village for houses in the £400-£600,000 price range often favoured by developers. Such homes are likely to be purchased by people wishing to move into the village. There is already a good supply of these homes.

2.4 The suggested distribution of homes:

Based on the Housing Need Survey and the number of homes allocated for each site in the S.W.D.P, homes have been distributed in the village as follows:-

Peachley Court Farm:

- 5, 3-bedroom open market houses,
- 1, 2-bedroom affordable bungalow or house.

Strand Cottages, Peachley Lane:

- 5, 3-bedroom open market houses,
- 1, 2-bedroom affordable bungalow or house.

Bell Lane/Martley Road:

- 4, 2-bedroom bungalows/ houses,
- 11, 3-bedroom houses,
- 6, 4-bedroom houses,
- 3, 3-4 bedroom bungalows all for open market,
- 7, 2-bedroom Affordable bungalows/houses.
- 9, 3-bedroom Affordable houses.

Total = 52 units. (34 open market, 18 affordable)

89.64% of those households that responded to the 'Community Plan Questionnaire January 2013' accepted this number of additional homes but were not prepared to support any further development and therefore no other sites will be investigated at this stage.

2.5 Design:

The design of homes will vary from site to site depending on its location. The village does not have a strong vernacular style but in making recommendations consideration should be given to aspect, materials, the protection of views, densities to reflect the sites surroundings and consideration of the areas rural setting.

For example a site surrounded by agricultural barns may



benefit from buildings of a similar scale rather than 'estate type' houses. Provision for car parking, cycle storage, refuse and recycling and general 'outside' storage should be allowed for in any design.

All homes should be designed to 'Lifetime Home Standards' and achieve as a minimum the thermal and ecological standards applicable at the time of construction. Reference has also been made to the 'Lower Broadheath Village Design Statement April 2008'.



The C.P should identifies the following in its design consideration for each site.

- 1) The number of homes considered suitable for the site.
- 2) The suggested types, design, layout, tenures and sizes of homes.
- 3) The standard of car parking provision required bearing in mind the rural location.
- 4) Any special uses recommended for the site.

Peachley Court Farm.

It is suggested that a Courtyard style development of six dwellings should be considered, linked to reflect the agricultural heritage of the site with plain tile roofs and elevations of good quality stock facing brickwork. The affordable dwelling may be a single storey unit to create additional interest. Courtyard style parking with 3 spaces for each of the 3 bedroom dwellings and 2 spaces for the 2bedroom unit should be provided. No dwelling should exceed two stories in height. Garages may not be desirable but each home should have a generous brick built external store suitable for the storage of refuse and cycles.

One access to the parking area should be off Peachley Lane with a brick boundary wall alongside the road. A high level of landscaping should be provided with enclosed rear gardens to create separation between this and industrial development to the north.

Storm water run-off into Peachley Lane is often a problem in this area. A collection area should be incorporated together with grey water recycling for the dwellings to prevent the run-off becoming worse as a result of the development.

Strand Cottages Peachley Lane.

Currently the site is occupied by a group of derelict cottages. Most homes in the area are detached and this practice may be considered desirable here. The site is designated for six dwellings and again no dwelling should exceed two stories and it may be desirable for some to be single storey. It is suggested that each home should have its own driveway off Peachley Lane and garages would be desirable with a level of parking similar to Peachley Court Farm. The garages should also provide facilities for the storage of refuse and cycles. Eco style homes with a contemporary design may be considered suitable with their use of materials and energy saving features. Again the disposal of surface water is likely to be an issue and grey water recycling should be a feature of the design. The capacity of any highway drainage is believed to be limited and soakaways may prove to be problematical with the nature of soils likely to be encountered. There are existing problems with the pond which adjoins the site and already takes surface water run- off. A considerable amount of work to the pond and its discharge is required.

The retention of the roadside hedge is considered desirable. There are attractive views to the rear of the development overlooking farmland. Every effort should be made to retain this view. A high level of landscaping should be incorporated into the scheme.

Because of the location of both sites they may not be considered suitable for the less active members of the community.

Bell Lane/ Martley Road.

Whilst this is a large site the S.W.D.P states that 40% of the site area should be retained as 'green space' to provide play and amenity spaces together with a village green on the corner of Bell Lane and Martley Road and therefore the number of homes is restricted to forty dwellings. This is a very important site located in the centre of the village. Roads within the site will need to be to adoptable standard and many people in the village feel a traffic island should be constructed on the B4204 to allow access from this site and a new junction created with Bell Lane, hopefully this will reduce traffic speeds. This may be desirable but is likely to restrict parking outside the post office and shop and would have a detrimental effect on their business. The steering group therefore feel that this is not an option to pursue. Reluctantly the access is likely to be off Bell Lane unless an access off Martley Road could be achieved and there will be a need to create visibility splays resulting in the need to remove significant lengths of the roadside hedge. This should be reformed on the new visibility splays to retain the rural nature of Bell Lane.

No dwellings should exceed two storeys in height and some bungalows on this site would be desirable to meet the needs of the less active members of the community. There are many attractive views from this site towards distant hills and it is important that these views should be retained particularly from the 'green spaces' and as many homes as possible.

The design of the homes should be of a 'cottage style', perhaps with dormer windows to first floor openings in detached, semi-detached and terrace form with varying roof lines using traditional materials with plain tile roofs, chimneys and good quality facing bricks to the elevations. Garages should be provided together with refuse and cycle store provision to as many homes as possible with driveways and additional parking leading off adopted roads. The use of shared driveways should be avoided if possible.



The latest standards for thermal efficiency should be a minimum requirement but there are concerns over the disposal of surface water without extensive improvements to water courses and the laying of adopted storm drainage to serve the site.



High levels of landscaping are essential and the use of enclosed front gardens with hedges is considered essential to retain the rural feel of the site. Some dwellings may face out onto Martley Road. In these cases parking and garages should be to the rear of the properties and together with the village green formed on the corner opposite the Bell Public House, creates a village centre.

Street lighting in the village is not considered desirable and any security lighting should be placed on individual homes.

Temple Laugherne:

It is anticipated that 975 homes allocated to this site under the S.W.D.P will be similar to those currently being built at Earls Court Farm and will be designed to a similar criteria but bearing in mind the sites location in relation to open countryside dwellings exceeding two stories in height should be avoided . Issues that are likely to affect the village are: The provision of educational facilities, worship, adequate social care, play areas, flooding, the lack of employment opportunities and the need to provide a protected area within the site for a future 'North West Worcester Flood Relief Road' with a direct access off the current Crown East Island at the junction of the A4440 and A44 roads. Less parking may be acceptable subject to the extension of the existing city bus service.

To protect the interests of these home owners access to the proposed gypsy and traveller's site should be from existing roadways rather than from estate roads.

There should be defined boundaries to the perimeter of the site with heavy landscaping to protect the interests of adjoining land owners and create the eastern boundary of the 'significant gap' between this development, Crown East and Lower Broadheath.

95.34% of respondents to the 'Community Plan Questionnaire January 2013' were not prepared to support any further development in this location.

2.6 Justification for limiting the numbers of new homes.

The Parish Council has made representations to the Inspector examining the S.W.D.P and copies of these documents are included in the Appendix 3. The reason for the representation is because it is considered the 'infrastructure' is totally inadequate to cope even with the needs of the existing population without any further development. The Parish Council considers without adequate infrastructure the whole plan is unsustainable. However it is acknowledged that some development is likely to take place and every effort must be made to ensure that the best possible developments are achieved.

In summary, the provision of any additional homes to the 52 dwellings allocated to the village and 975 at Temple Laugherne should not be permitted.

3.0 Infrastructure

3.1 Introduction

The infrastructure is an important part of the C.P. It must aim to achieve a sustainable environment for those already living in the parish, those moving to area and for current and future generations so that their 'quality of life' is not diminished as a result of development and indeed should seek to enhance such 'quality'. The economic prosperity of the Parish is dependent upon employment, some estimated 80% of which is principally situated in Worcester and further afield on the East side of the river Severn. This section deals with the homes planned for the village and also the needs of the 975 homes planned at Temple Laugherne together with the Gypsy and Travellers site also planned in this location.

Not all of the issues can be addressed by a Community Plan but their inclusion and study is important so that they may be addressed by the appropriate body and make the SWDP truly sustainable.

Whilst discussed in paragraph 2.6 above the inadequacy of the infrastructure is repeated here to stress its importance. 'The Parish Council has made representations to the Inspector examining the S.W.D.P and copies of these documents are included in the Appendix 3. The reason for the representation is because it is considered the 'infrastructure' is totally inadequate to cope with the needs of the existing population without any further development. **The Parish Council considers without adequate infrastructure the whole plan is unsustainable. However it is acknowledged that some development is likely to take place and every effort must be made to ensure that the best possible developments are achieved**'.

3.2 Highways and Transportation:

- **Transport by Road**

With the advent of the A4440 reaching as far as Rushwick in the c1990's Lower Broadheath's category C lanes have become a commuter route for motorists wishing to cross the river Severn at Holt Fleet. It is of little surprise to find that in the 'Community Plan.

Questionnaire January 78.76% of respondents favoured the completion of the North West Flood Relief Road (NWFRR).

The reason for this lies outside of the Parish but is briefly set forth here for clarity.

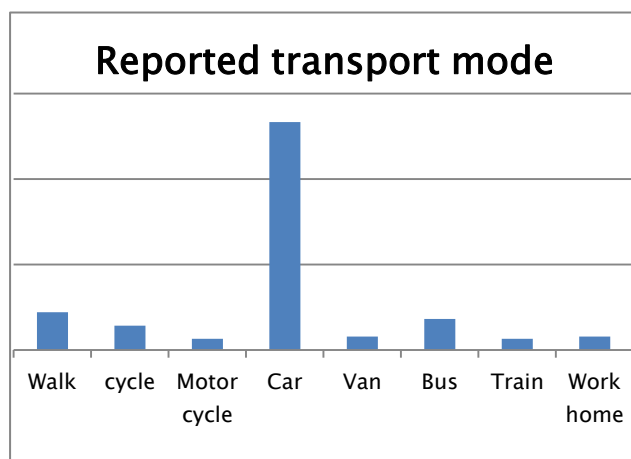
The main traffic flow around Worcester is to and from the SW to the NE and return. Traffic analysis shows that greater than 60% of the vehicles arriving at the Powick roundabout arrive there merely to cross the river Severn. Both the central Worcester City Bridge and the Carrington Bridge on the A4440 are in gross overload causing very substantial traffic blocks during business hours and at many other times as the population of South Worcestershire increased. The Government has recently awarded a grant of £14.2M to remodel the A4440, Ketch roundabout and to create a dual carriageway road from the Ketch (junction with the A38) to Wittington. This expenditure will do nothing to alleviate the bottleneck at the Carrington Bridge, and its attendant tail back which chokes the roundabout at Powick.

Further, the SWDP plans for 2,450 additional homes at Norton. This development will cause yet further cross traffic at both the Ketch and Norton roundabouts again inhibiting the traffic flow.

Motorist, will therefore continue to find it advantageous, to take an extended journey via the lanes through Lower Broadheath to cross the river at Holt Fleet. This situation will be made worse by the SWDP plan for approximately 5,000 new homes and employment developments planned for Malvern, Temple Laugherne, Earls Court Farm, Clifton upon Teme, Martley and our own village whilst the majority of employment opportunity is located east of the river Severn.

Even before the A4440 was extended to Rushwick, the Parish of Lower Broadheath has supported, and continues to support, the completion of the NWFRR to complete the fourth quarter of a Worcester ring road. It is considered that it is essential to bring this project forward to not later than 2020 and the responses to the **'Community Plan Questionnaire January 2013'** clearly demonstrates this is the desire of the community with a support rating of **78.76%**. Whilst always being a major issue in previous Parish Plans demand for its completion has increased since the S.W.D.P. has been published. Members of Parliament, District and County members and officials should use their best efforts to support the wishes of their electorate. The current stringent financial situation will pass. We therefore urge the Worcestershire County Council to prepare a costed outline plan for the NWFRR. A failure to make this step leaves the district vulnerable to being passed over by Government as not being prepared or ready when funding does become available. We reiterate. Providing a third road crossing of the river Severn to the North of the City of Worcester would release capacity for traffic using the A4440 and Carrington Bridge by creating an alternative route between SW to NE and visa-versa.

The lack of adequate road crossing points on the river Severn, causing the major traffic restrictions to the free flow of goods and people, continues to be a substantial barrier to potential employment on the west side of the river. This in turn exacerbates the chronic



commuter traffic jams experienced daily.

The 'Community Plan Questionnaire January 2013' survey canvassed the travel to work modes of residents. The modes are shown in the Bar graph. We also asked their opinion on how necessary a good road transport network was for the local area.

90% of respondents rated this as very necessary and essential.

New employers will not be attracted to move to any employment sites west of the river Severn, which is a barrier to the free movement of goods and services and remains unresolved.

- **Transport by Rail**

With access to the rail network at the two stations in Worcester being located upon the East side of the river Severn and due to the highly restricted nature of the car parking arrangements, less use than could be, is made of this facility. There are no direct connections to destinations North and South of Worcester. The need for an interconnection increases journey times and thus acts as a further barrier to adopt rail transport as a preferred inter-city option.

Worcester Parkway is a stated objective and the S.W.D.P. does make allowance for the protecting this area of land for this purpose but there is no guarantee that development will take place within the lifetime of this plan. The down side of Worcester Parkway is that it will create even more vehicular traffic trying to access this facility and would need significant highway enhancements to make it viable.

In the 'Community Plan Questionnaire January 2013' this received a support rating of 69.95%.

With the above restrictions road transport to and from the Parkway from the west side of the river Severn will create even more vehicular traffic trying to access this facility with the need to travel along the A4440 and over the black spot of the Carrington Bridge.

- **Transport (Public)**

The limited bus service for the village is common for many similar areas. Bus services extending beyond the major urban areas are mostly subsidised. Such subsidies are reducing and this pattern is not expected to change.

The Community survey showed a strong correlation between journeys for education and the use of the bus. The bus use may well be overstated due to the dedicated bus service to transport Lower Broadheath students to 'The Chantry' and the 'Free Bus' Pass Scheme.

The economics of the bus service through Lower Broadheath is regarded as marginal.

It remains to be seen if even this limited bus service would survive if the 'Free Bus' Pass scheme were to be withdrawn.

A limited bus service Monday to Saturday into and out of Worcester is operated by Aston coaches, supported by a subsidy from Worcestershire County Council. Such services mainly leave from the Post Office and the Bell Inn. Two of these services traverse many parts of the village. A further bus connection is possible by walking out of the village to Martley turn at the junction of the Martley and Hallow roads.

The last bus service from Worcester leaves the city at 1745 hrs.

It is therefore easy to see why the private car remains the method of choice for both employment and social needs.

- **Transport by Bicycle.**

Two road routes into Worcester are currently available for cyclists, namely the Martley Road B4204 and one via Crown East and a section of the A44 which has a partial cycle lane. Both of these routes expose cyclists to heavy traffic from large goods vehicles.

During the consultation process for (Local transport Policy 3 (LTP3) Lower Broadheath proposed a route using Bell Lane, with Sling Lane coupled to a joint footpath and cycle path proposal to Oldbury Road and a dedicated crossing to the cycle way along the banks of the Severn. Such a route would remove the parental objection to young people using their bicycles to attend the later years and sixth form schools in the city.

In the 'Community Plan Questionnaire January 2013' this received a support rating of 64.25%.

The Parish Council will continue to work with Worcestershire County Council in an effort to improve all modes of transport in order that both the forthcoming Local Plan and the Community Plan can be made truly sustainable.

3.3 Flooding, Drainage and Global Warming:

Localised flooding already occurs in the village which in recent years has become worse possibly as a result of global warming with flooding generally becoming more of a problem. Inadequate storm drainage and poorly maintained water courses and ditches are also a significant factor.

Most storm water from existing properties in the village discharge into soakaways which are inadequate in an area with predominately heavy clay sub soils. Others discharge into highway drainage systems and yet more have been diverted into foul drainage systems that were never intended to carry storm water. This results in the surcharging of these sewers in times of very heavy rain and consequential danger to health. The Environment Agency and Severn Trent should seek to ensure that new developments have properly designed storm water drainage systems. At present riparian land owners have a responsibility for the maintenance of many water courses crossing their land. This is totally unacceptable when there is going to be a significant increase in 'run off' as a result of new developments. We learn that developers consider surface drainage on the basis of a 100 year storm plus 30% to predict global warming. However with the temperature of the Atlantic set to rise, such storms will occur with increased frequency.

The Parish Council will monitor any new development carefully by offering our local knowledge.

It is assumed that the 975 homes planned for Temple Laugherne will have properly designed foul and storm drainage and will not be built on the Laugherne Brook flood plain.

Guidance from Severn Trent Water will be required to ensure that the foul sewers in the village are adequate to cope with the new developments planned and pay particular attention to the unauthorised discharge of storm water from existing properties.

3.4 Hospital and Health Care:

In response to the **Parish Plan Update 2010 90% of respondents** considered the existing facilities inadequate to cope with any additional development. There are plans to provide new health care facilities at Grove Farm and these will hopefully deal with some of the less serious cases from the Temple Laugherne development and Gypsy and Travellers site. Existing residents in the village currently use doctor's surgeries in Worcester, St Johns, Great Witley and Knightwick, which all involve the need to travel with in some cases potential parking problems. The parish council does offer transport for those unable to reach these facilities but it is a service little used. Dentists are also available in Worcester and St Johns. The Parish Council will continue to investigate the possibility of health care specialists setting up surgeries within the village or sharing with adjoining villages for those with transport difficulties and reduce the need to travel for all. This would of course also benefit new residents.

The most serious concern however is the 'Acute Hospital' provision and due to budgetary constraints this service appears to be 'reducing' rather than expanding.

The Parish Council will discuss this issue with the NHS and unless assurances are received that it has the facilities to provide adequate care for the considerable growth anticipated in South Worcestershire then the sustainability of the whole development plan must be in doubt.

3.5 Education:

The Parish Plan Update 2010 indicated strong support for the current local schools with only just under 6% saying they would send their children to different school. It is likely that both Broadheath Primary School and the Chantry School at Martley would be able to cope with the additional children from the village but not those from Temple Laugherne. There would be strong resistance to any attempt being made to transfer children from the village to schools in Worcester. Both schools however would benefit from either Section 106 or Community Infrastructure Levy (CIL) contributions to help fund ever changing educational demands.

17.62% of respondents to the Community Plan Questionnaire January 2013 considered that the village would benefit from a replacement primary school.

It is anticipated that children living at Temple Laugherne would attend schools in Worcester. Subject to checking that local schools are able to cope with the likely increased intakes and that they would benefit in monetary terms there is little other action required unless attempts were made to change catchment areas.

3.6 Employment:

There is no provision in the S.W.D.P. for additional employment opportunities within the village, although the **'Community Plan Questionnaire January 2013'** showed a **70% approval for light manufacturing**. A similar situation is likely to exist for new developments at Clifton upon Teme, Martley and Hallow, all of which will create additional traffic flows through the village with people commuting to work outside the area.

As part of the Parish Council SWDP consultation of soundness the spatial location of employment was investigated. This indicated that 80% of the employment opportunities were on the east side of the river Severn.

Should there be a demand, some of the sites suggested for housing development may be suitable for 'live/ work' units. There may be some employment opportunities at current commercial sites within the village. These are:

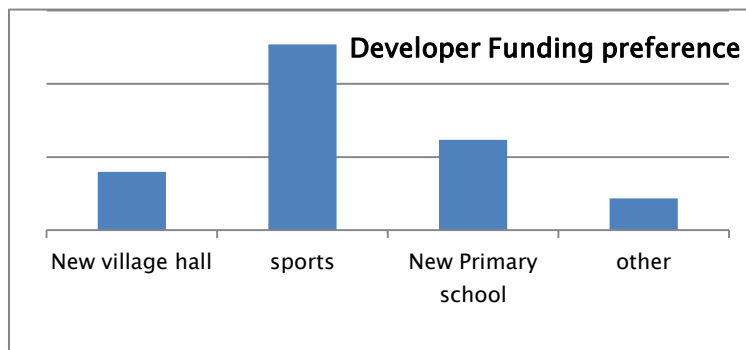
- Food factories on Martley Road.
- Peachley Court Farm Business and Caravan Park.
- Various Equestrian Centres.
- Public Houses and Restaurants.

It is likely that most living in the village will either work in Worcester or commute outside the area again creating additional traffic on an already congested highway network around Worcester. 11 h/a. of employment land at Grove Farm is for the University and a Health Care Facility and The 5h/a. of employment land allocated at Temple Laugherne will only offer limited employment opportunities.

60.62% of respondents to the 'Community Plan Questionnaire January 2013' considered there was a need for more local employment opportunities with the majority favouring light manufacturing as mentioned above. The Parish Council will discuss this need with Malvern Hills District Council and investigate the following:

- The need to provide additional employment land to give opportunities for those new residents in the village and at Temple Laugherne.
- Transportation issues if additional employment land is allocated.
- Problems created by commuting from this geographical location.
- Demand for live/work units and encouraging people to work from home.

3.7 Leisure Facilities:



The results obtained in the Parish Plan 2007 were not conclusive and have been revisited in the Questionnaire 2013. The 'Community Plan Questionnaire January 2013' indicated that if funding was available the following would be desirable:

- Additional sports facilities. 36.27% (various suggestions made including tennis courts, hard sports open and covered areas.
- New larger village hall. 11.40%
- Other unspecified items. 6.22%

It is anticipated that the needs of those people moving into the village will be similar. Children's play areas are likely to be provided as part of the design concept on larger housing schemes. Considerable efforts have been made in the last two years to establish more activities in the church and village hall, these have met with considerable success and more could be achieved with CIL support. The Parish Council will also look at shared provision of sports facilities with adjoining parishes and will support any initiatives that may be available.

Additional homes in the village should also benefit pubs and restaurants.

It is anticipated that those people living at Temple Laugherne and at the Gypsy/ Travellers site will benefit from on-site leisure facilities and will also look towards Worcester for other facilities.

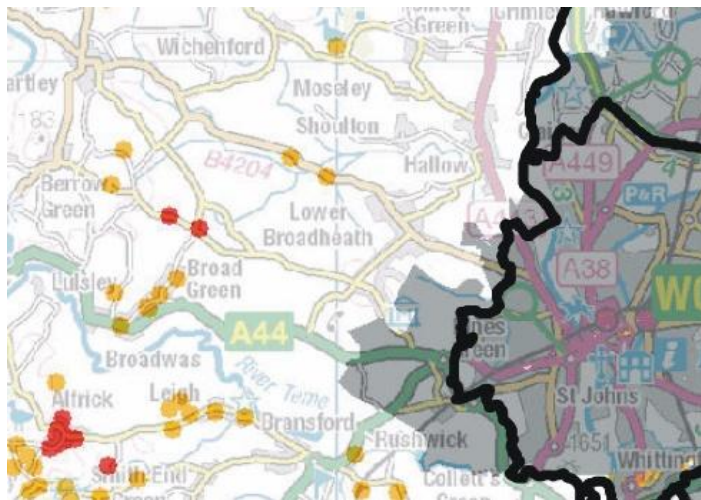
3.8 Environmental Issues:

The following issues have been studied:

- The retention of the village shop and post office is seen as the most important single issue in the Parish Plan 2007 with a 95% support rating and this still remains very important. There are concerns over the danger of parking near this facility which is likely to become worse with increased traffic. The Parish Council working with the Police and Highways will continue to monitor this situation.
- In the same plan 94% of respondents liked living in the village and in the
- **'Community Plan Questionnaire January 2013' 56.99% of respondents indicated if they decided to move house they would prefer to stay in the village.**
- Radon gas is known to occur in the village and potential developers should be made aware of this issue and deal with it in the design and construction of new homes.

- Waste disposal. The existing weekly service is excellent and nothing should be done to reduce this level of service. From May 2013 the weekly collection of residual waste via the 'black bag' system will continue as a weekly collection and 'wheelie bins' will be provided for the collection of recyclable waste including glass on a fortnightly collection basis. Complaints about the unsightly appearance of these bins are made countrywide and whilst developers should make provision for the storage of these it is hoped that existing residents will take care in placing these so that they do not become an 'unsightly appearance on the landscape'. It is not known who will provide the service for Temple Laugherne; this will be either Malvern Hills or Worcester City?
- Protection of natural habitats. Any development must ensure these are protected.
- Farming. The village is surrounded by good quality and productive arable farming and no development should be undertaken that will have a significant impact on this sector of the economy. Much of this land will be protected by the 'significant gap' discussed below but the fact remains land will be lost to the Temple Laugherne development and this loss will be repeated across the nation. Every effort should be made to develop 'brownfield sites' before using 'greenfield sites' so favoured by developers.
- Public rights of way. The parish enjoys significant numbers of public footpaths and bridle ways for the benefit of all. In the Parish Plan 2007 residents felt that these should be better maintained. Improvements have been made and the study has found that more work is needed. The Parish Council will continue to monitor this situation in spite of a considerable amount of work having been undertaken since the 2007 plan.
- The Common. A very important part of the community and a facility enjoyed by walkers and horse riders. Flooding caused by water flowing off the Common has been an issue. The works recently undertaken have helped to reduce the problem. The Parish Council will continue to monitor this issue and see if any further action is required. Efforts are also being made to prevent vehicles parking on the edge of the common and causing damage. Adjoining residents can help by ensuring visitors do not park on the Common, Wastes or Verges in Sling Lane, Bell Lane, Crown East Lane and Laylocks Lane.
- Tree preservation Orders. There are numerous trees in the parish which are worthy of retention that are not covered by tree preservation orders. The Steering Group will encourage the local authority to undertake a comprehensive survey to ensure their protection together with old established woodland and hedge rows.

3.9 Broadband:



WCC published a map of the slow broadband sites within the county. Lower Broadheath connection is unmarked but remains very slow.

The returns from the community survey established that the average broadband speed was 3.37mbs. The survey also indicated that properties located furthest from the Hallow and Cotheridge exchanges reported the slowest speeds.

The map is far from complete in terms of detail.

In Bell Lane, even after BT introduced a recent upgrade, speeds of above 2mbs remain unavailable.

Very slow electronic communication speed severely restricts home working. Small businesses which depend upon the free transmission of large quantities of data such as Architects, Media designers, Solicitors etc. all of whom could enhance the rural employment, remain trapped in urban areas. The additional commuter traffic to urban areas, together with the tendency for rural persons to work in urban areas, will continue until the bottleneck of slow communication is removed.

The Parish Council will investigate how this essential element of infrastructure can be improved working in conjunction with Worcestershire County Council and BT

3.10 Measures to establish a 'Significant Gap' between the Village and Worcester:

89 % of respondents to the questionnaire considered that a green gap should be established.

As previously stated the village is very proud of its 'rural feel' and is anxious not to become another suburb of Worcester. The SWDP has gone a considerable way to improve and protect this important area of land, most of which is of agricultural importance. There is a worry that over a period of time there could be 'creeping expansion' of the Worcester City boundary and there are several issues that both the District and County Council should consider:

- 'Green Belt' designation.
- Completion of the North West Flood Relief Road (NWFRR) as soon as possible.
- Agree a specific route for this road the line of which should be included in the Local Plan.
- Ensure that the Crown East Island on the junction between the A4440 and A44 roads is protected and land within the Temple Laugherne development is allocated to allow for the completion of the NWFRR.
- Other physical barriers such as designated woodland areas.

4. Conclusions.

Summary of responses received from further consultation and action taken.

Lower Broadheath Community Plan 2013

Schedule of Appendices

- Appendix 1. Responses to Community Plan Questionnaire January 2013.

- Appendix 2. Analysis of the 'Housing Need'; taken from the Parish Plan 2010 Housing Need Survey.

- Appendix 3. Parish Council Representations on the South Worcestershire Development Plan to be taken to the forthcoming Examination in Public of the South Worcestershire Council's submission to the Governmental Inspector. S.W.D.P's. 1 (Overarching Sustainability Principles Appendix D), 4 (Moving Around South Worcestershire) and 7 (Infrastructure).

Appendix 1

LOWER BROADHEATH COMMUNITY PLAN QUESTIONNAIRE JANUARY 2013

The percentage response has been given in red beside each question.

1. The new development planned at Temple Laugherne will see the edge of Worcester City creep closer to the villages of Lower Broadheath and Crown East. Your Parish Council wishes to prevent any further development on the remaining farmland.
Do you agree with this? **YES, NO. [89.12% in favour/8.29% against.]**
2. Do you consider *more* new homes over the 52 described in the current plan should be built in the village up to the year 2030? **YES, NO.**
If **YES**, please state number, and where? **[7.25% in favour/89.64% against. Suggested sites include: Hallow Lane, Boulton's Nursery, Peachley Lane.]**
3. Do you consider *more* new homes over the 975 described in the current plan should be built at Temple Laugherne up to the year 2030? **YES, NO. [3.1% in favour/ 95.34% against.]**
If **YES**, please state number?.. **No specific numbers offered**.....
4. Is your home privately owned?.....**[94.82%]**.....rented?..... **[1.04%]**housing association?..... **[0.52%]**
5. How many persons live in your home?. **Average = 2.47**.....How many bedrooms?.. **Average = 3.35**
Average occupancy persons per bedroom = 0.74
6. How many cars and/or vans are there in your household? **1, 2, 3, 4, 5, 6. Average car number per household = 1.88**
7. In your household please number " Retired". **[34.40%]** "In Employment" **[35.70%]** "In Education" **[12.30%]** "As Volunteer" **[1.10%]**.....
8. Is your employment / education mainly EAST **[32.4%]** or WEST **[26.94%]**of the river Severn?
Education, which is predominantly situated on the west side of the Severn, influenced this result (See question 12 for employment)
9. Please estimate your journey time to and from your employment/education.. **[31mins average]**
10. How essential is a good local road network to you and your family? Not very... **[8.81%]**Very... **[46.11%]**
Essential... **[30.57%]**
11. If you and/or others in your household work or are in education, how do you travel? **Walk [8.81%], Cycle [5.70%], Motor Bike [2.59%], Car [53.37%], Van [3.11%], Bus [7.25%], Train [2.59%], Work from home [3.11%].**
(You may indicate more than one option)
12. Your location of Work/Education? **Of the respondents who stated where they worked, 26.5% were west of the Severn and 73.5% were on the east side.**.....
Route taken? **Various**.....
Bridge used (if applicable)? **Various**.....
13. Do you support the plan to construct a cycle track from Sling Lane to Dines Green? **YES, NO. [64.25% in favour/ 32.12% against]**
14. Do you support the construction of a Parkway rail station at Norton for long distance E.W.N.S rail travel? **YES, NO. [69.95% in favour/ 19.69% against]**
15. Do you consider the North West Flood Relief Road (including a new river crossing) around Worcester should be completed? **YES, NO. [78.76% in favour/ 15.54% against]**
16. Would you like to see more local employment opportunities? **YES, NO. [60.62% in favour/25.39% against]**
If **YES**, what type? Please list **Light manufacturing appears most popular**.....
17. Do you need higher Broadband Speeds for (a) **Work?** (b) **Other Activities?** **YES [54.04%], NO [24.35%].**
18. What is your current broadband speed?.. **Various**
19. Are there any features you would like to see on new developments? For example: Style of Architecture, Open Spaces, Parking arrangements, Play areas, etc. Please list... **Architecture 15.54% Open Space 31.09% Parking 26.42%**
20. Are there any new leisure, play or sports facilities you would like to see in the village? (please list)... **See responses in plan**
21. If Developer funding (Community Infrastructure Levy) was to become available, what would you prefer; **New larger village hall? 11.4% Additional sports Area? 36.27% Replacement Primary School? 17.62% Other? 6.22%**
22. If you decided to move home would you prefer to stay in the village? **YES [56.99%], NO [19.69 %]**
23. Please add any other comments you wish to make. **Comments were mainly to express concern of not losing the character of LBH as a village. Residents do not wish to live in a suburb of Worcester**
24. Please indicate the age group of the person completing the questionnaire. **18-30 [2.07%]. 31-40 [4.66%]. 41-50 [14.51%]. 51-65 [32.64%]. Over 65 [44.56%].**
25. Please quote your postcode. **Not applicable in responses.**.....
26. Your name and address would be helpful, but this is optional: **Not applicable in responses.**

Thank you for completing this Questionnaire, the answers will be analysed with those responses received in the Parish Plan 2007 and the Parish Plan Update 2010 and used to prepare a new Community Plan 2013.

Appendix 2

Analysis of Housing Need

Details extracted from Lower Broadheath Parish Plan Update 2010.

Rental only	1-2 Bedroom Flat 1-3 Bedroom House
Rental/Shared Ownership	3-2 Bedroom Flat 3-3 Bedroom House

Therefore, need for rental / shared ownership = 50% 2 bed flats/bungalows/houses and 50% 3 bedroom houses

Properties to Purchase

1 x-2-Bedroom Flats	1.64%
1 x 2-Bedroom Flats	1.64%
5 x 2-Bedroom Houses	8.20%
37 x 3-Bedroom Houses	60.66%
11 x 4-Bedroom Houses	18.02%
4 x 3-Bedroom Houses	6.56%
1 x 4-Bedroom Bungalow	1.64%
1 x 3-Bedroom Flat	1.64%
-----	-----
61 Total*	100.00%
-----	-----

* Note whilst in responding to the questionnaire 61 people indicated a desire for these type of properties the same respondents wanted to see less than 50 homes in the village, so these results have been used to determine the percentages only, of the types of dwellings needed.

Only a small number of people responded to this question and therefore numbers have only been used to achieve percentages.

South Worcestershire Development Plan Proposed Submission Document SWDP 1 Representation Form

Please return by **5.00pm** on the **22nd February 2013** to:
South Worcestershire Development Plan Team,
Orchard House,
Farrier Street,
Worcester
WR1 3BB

or

contact@swdevelopmentplan.org

Ref:

(For official use only)

Please complete a separate form for each representation you wish to make

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- Please complete Part B of this form for each representation you wish to make. You do not need to complete Part A more than once, *but please ensure you state your name or organisation as applicable at the top of each Part B form you submit.*
- Please refer to the attached guidance notes on making representations so that they address issues of legal compliance and/or soundness.

Please note that when representations are submitted only Part B of the form will be published. Contact details on Part A will not be published.

PART A

How we will use your details

The personal information you provide on this form will be processed in accordance with the requirements of the Data Protection Act 1998. It will be used only for the preparation of local development documents or any subsequent statutory replacement. However, your name and representations will be made publicly available when displaying and reporting the outcome of the consultation stage, and cannot be treated as confidential. Other details including your address and signature will be treated as confidential.

In agreeing to the holding of your information you are giving permission for your details, held on the database, to be shared between the three local authorities. If you have any concerns or queries relating to this process, please contact 01905 722233.

I agree that the contact details and any related responses can be held by the planning service departments of the three South Worcestershire local authorities. I understand that they will only be used in relation to the plan making process as required by the Planning and Compulsory Purchase Act 2004 and other planning-related legislation.

Part A

1. Personal Details*

*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	Mr	
First Name	Michael	
Last Name	Davis	
Job Title (if applicable)	Clerk to Lower Broadheath Parish Council	
Organisation (if applicable)	Lower Broadheath PC and Save Elgar's Village 'SaEV'	
Address Line 1	35 Oakfield Road	
Address Line 2	Malvern	
Address Line 3	Worcestershire	
Address Line 4		
Postcode	WR14 1DS 01684 569864	

Telephone Number	<input type="text"/>	<input type="text"/>
E-mail address	mikedavis@worldonline.co.uk	<input type="text"/>

Part B – Please use a separate sheet for each representation

Name or Organisation

3. To which part of the SWDP does this representation relate?
 Paragraph Policy Proposals Map

If your comment does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

4. Do you consider the SWDP is legally compliant?
 YES NO

Please give details of why you consider the SWDP is not legally compliant. Please be as precise as possible.

[A typographical error exists in the list of category 3 settlements. ‘Upper Broadheath’ should not be included in this list.](#)

5. Please set out what change/s you consider necessary to make the SWDP legally compliant, having regard to the issue/s you have identified above. You will need to say why this change will make the SWDP legally compliant. It will be helpful if you are able to put forward your suggested revised working of any policy or text. Please be as precise as possible.

[Remove the listing of ‘Upper Broadheath’ from page 235 as it is not a separate settlement](#)

6. Do you consider the SWDP to be sound?
 YES NO

If you consider the DPD is unsound is this because it is **not**:

1. Justified	<input type="text"/>
2. Effective	<input type="text"/>
3. Consistent with national policy	<input type="text"/>
4. Positively prepared	<input checked="" type="text"/>

7. Please give details of why you consider the DPD is unsound. Please be as precise as possible. If you wish to support the soundness of the DPD, please also use this box to set out your comments.

Confusion over the naming of the village of 'Lower Broadheath' has existed for some time and came to prominence during the RSS submission. The populous of the village were consulted by a questionnaire circulated, by Malvern Hills District Council. An overwhelming vote in favour of 'Lower Broadheath' was received.
We confirm an order changing the name of the village to Lower Broadheath was signed by MHDC on 15th August 2012.

8. Please set out what change/s you consider necessary to make the DPD sound, having regard to the test you have identified at 6 above, where this relates to soundness. You will need to say why this change will make the DPD sound. It will be helpful if you are able to put forward your suggested revised working of any policy or text. Please be as precise as possible.

Correct the typographical error by removing 'Upper Broadheath' from the Category 3 settlements on page 235

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation on legal compliance and / or soundness and the suggested change(s) necessary to make the plan sound, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will only be made at the request of the Inspector, based on the matters and issues he / she identifies for examination.

9. If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

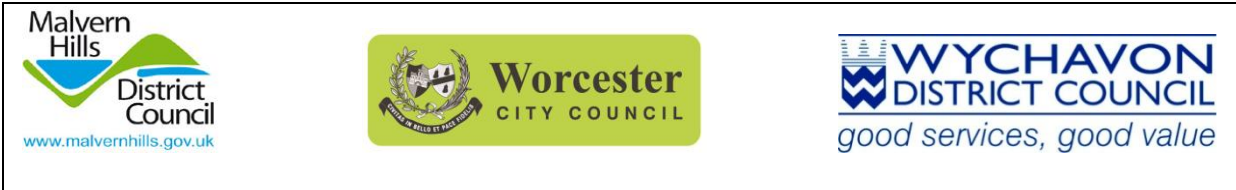
NO I do not wish to participate at the oral examination **YES** I wish to participate at the oral examination

10. If you wish to participate at the examination, please outline why you consider this to be necessary

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral part of the examination

Signature

Date



South Worcestershire Development Plan Proposed Submission Document

Representation Form (SWDP 4)

Please return by **5.00pm** on the **22nd February 2013** to:
South Worcestershire Development Plan Team,
Orchard House,
Farrier Street,
Worcester
WR1 3BB

or

contact@swdevelopmentplan.org

Ref:

(For official use only)

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This form has two parts:

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Part B: Your representations.

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- Please refer to the attached guidance notes on making representations so that they address issues of legal compliance and/or soundness.

Please note that when representations are submitted only Part B of the form will be published. Contact details on Part A will not be published.

PART A

How we will use your details

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I agree that the contact details and any related responses can be held by the planning service departments of the three South Worcestershire local authorities. I understand that they will only be used in relation to the plan making process as required by the Planning and Compulsory Purchase Act 2004 and other planning-related legislation.

Part A

1. Personal Details*

*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	Mr	
First Name	Michael	
Last Name	Davis	
Job Title (if applicable)	Clerk to Lower Broadheath Parish Council	
Organisation (if applicable)	Lower Broadheath P.C & 'Save Elgar's Village' SaEV	
Address Line 1	35 Oakfield Road	
Address Line 2	Malvern	
Address Line 3	Worcestershire	
Address Line 4		
Postcode	WR14 1DS	

Telephone Number	01684 569864	
E-mail address	mikedavis@worldonline.co.uk	

Part B – Please use a separate sheet for each representation

Name or Organisation

3. To which part of the SWDP does this representation relate?
 Paragraph Policy Proposals Map

If your comment does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

4. Do you consider the SWDP is legally compliant?
 YES NO

Please give details of why you consider the SWDP is not legally compliant. Please be as precise as possible.

In addition to the City bridge in Worcester the Carrington bridge was opened in 1985 to form the southern link road. From 1984 - 2011 the population of South Worcestershire grew by 48000 mostly in Worcester and Wychavon. As a result both bridges are now substantially overloaded.

This overloading of the road crossings for the river Severn acts as a substantial barrier to the free movement of people and goods from east to west and vice-versa. The SWDP fails to address the vital need for this to be rectified, including the requirement for a third road river crossing within the infrastructure provision. In consequence, the plan to locate some 12000 extra persons, out of the 35000 required in the SWDP, on the wrong side of this barrier, renders the plan unsustainable and wilfully adds to environmental degradation, reducing the quality of life of both those currently resident and of the incoming families.

In addition the SWDP fails to preserve from development the land required for the continuation of the NWRR despite including it being an objective.

See pages 2-32 of the NPPF – ‘Achieving sustainable development’.

5. Please set out what change/s you consider necessary to make the SWDP legally compliant, having regard to the issue/s you have identified above. You will need to say why this change will make the SWDP legally compliant. It will be helpful if you are able to put forward your suggested revised working of any policy or text. Please be as precise as possible.

New developments on the West side of the river Severn both for Malvern Hills and the west Worcester Urban extension should not be permitted until the provision of a third road river crossing is secured together with dual carriageway from the Powick roundabout to the M5 at junction 7.

The land providing for the continuation of the Worcester ring road known as the North West Flood Relief road should be preserved from development.

6. Do you consider the SWDP to be sound?

YES

NO

If you consider the DPD is unsound is this because it is **not**:

- | | |
|------------------------------------|-------------------------------------|
| 1. Justified | <input type="checkbox"/> |
| 2. Effective | <input checked="" type="checkbox"/> |
| 3. Consistent with national policy | <input checked="" type="checkbox"/> |
| 4. Positively prepared | <input checked="" type="checkbox"/> |

7. Please give details of why you consider the DPD is unsound. Please be as precise as possible. If you wish to support the soundness of the DPD, please also use this box to set out your comments.

As a consequence of the seriously congested bridges, congestion which continues throughout the day and evening on most days of the week, residents currently living on the west side of the river Severn experience inhibited access to 80% of SW employment (see attached report and map). This applies to the M5 motorway, Higher education, Hospital, major retail and leisure facilities as well as to the regional centres of religion, local government administration and Bee Hive library.

By planning to locate some 12000 persons on the wrong side of this barrier, without adequately addressing the need for a third road river crossing within the infrastructure provision, the SWDP is rendered contrary to the sustainability, economic and social objectives of the NPPF.

This continuing bottleneck is likely to inhibit new employment coming to the west side still more than is already the case.

The rapid population growth of Worcester between 1988 and 2000 without additional employment land provision has radically increased "out of city" commuting.

Traffic surveys suggest that more than 60% of the road traffic crossing the Carrington bridge, do so just to cross the river and have little requirement to interact with the business or social life of Worcester City. The traffic flow is mainly from SW to NE and return. The proposed NWFRR would relieve much of the traffic currently using the Carrington bridge.

8. Please set out what change/s you consider necessary to make the DPD sound, having regard to the test you have identified at 6 above, where this relates to soundness. You will need to say why this change will make the DPD sound. It will be helpful if you are able to put forward your suggested revised working of any policy or text. Please be as precise as possible.

- Partial redistribution of the number of homes planned to the south and west of Worcester, including Malvern, to balance numbers with affordable infrastructure improvements.
- Dual the Carrington Bridge and causeway from the Powick roundabout to the

Ketch, with associated junction improvements.

- Preserve the land from development for the provision of the North West Flood Relief road.
- Alternatively bring forward the completion of the North West Worcester flood relief road together with an additional bridge crossing by not later than 2020, with a firm governmental promise of funding. This would make employment opportunities more attractive to investors to the west of Worcester which currently fails to attract employment because of poor and overloaded road communications.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation on legal compliance and / or soundness and the suggested change(s) necessary to make the plan sound, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will only be made at the request of the Inspector, based on the matters and issues he / she identifies for examination.

9. If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

NO I do not wish to participate at the oral examination

YES I wish to participate at the oral examination

10. If you wish to participate at the examination, please outline why you consider this to be necessary

The SWDP still fails to address the importance of vital river bridge infrastructure and the negative influence such omissions will have upon future inward investment for employment. The Examination in Public an important opportunity for the Village to place its concerns in front of a person of influence.

Our concerns have been addressed to both the RSS and SWDP over a number of years supported by two Parish Plans and three SaEV submissions.

Housing is planned to 2030, and will result in adding approximately 35000 persons to South Worcestershire. The absence of any infrastructure provision to alleviate an already serious situation will lead to a severe danger of gridlock, affecting not just the daily lives of the local population, and seriously hampering any growth in Tourism, but also the ability of the Emergency Services to perform their vital role.

We would remind you that during the 2000 flooding both the Worcester City and Upton upon Severn bridges were impassable.

Ignoring the barrier that the river Severn currently presents, is contrary to NPPF aims for new development.

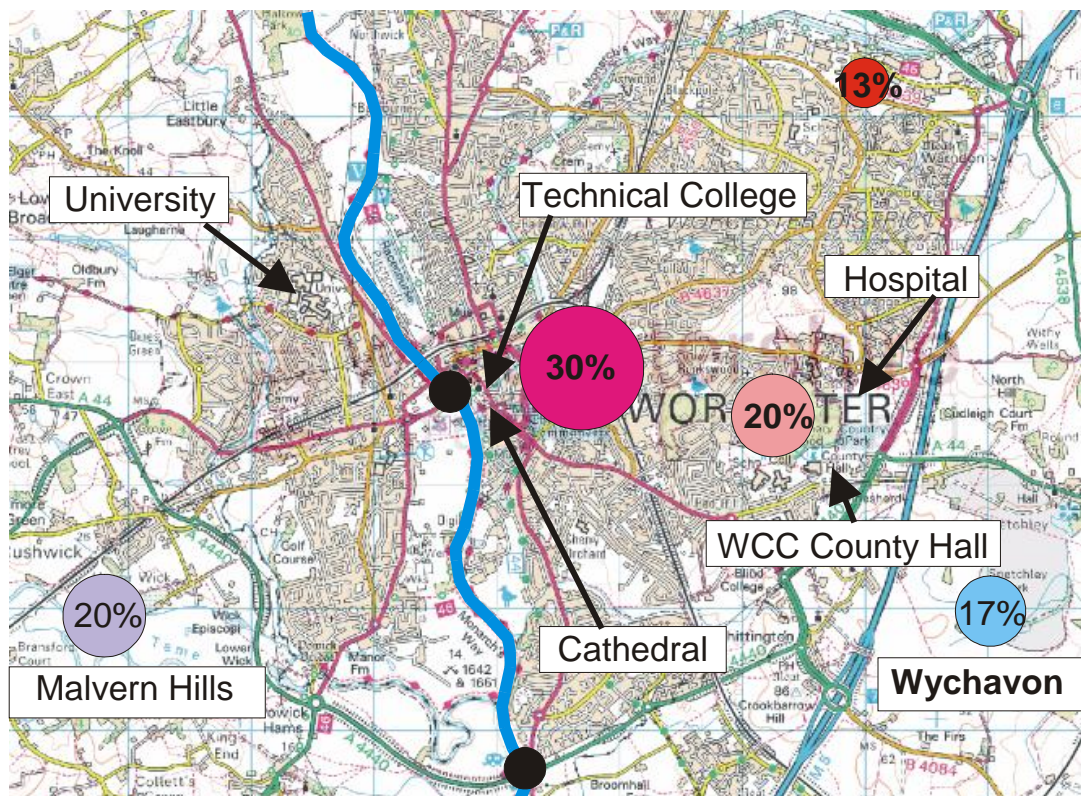
Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral part of the examination

Signature

Date

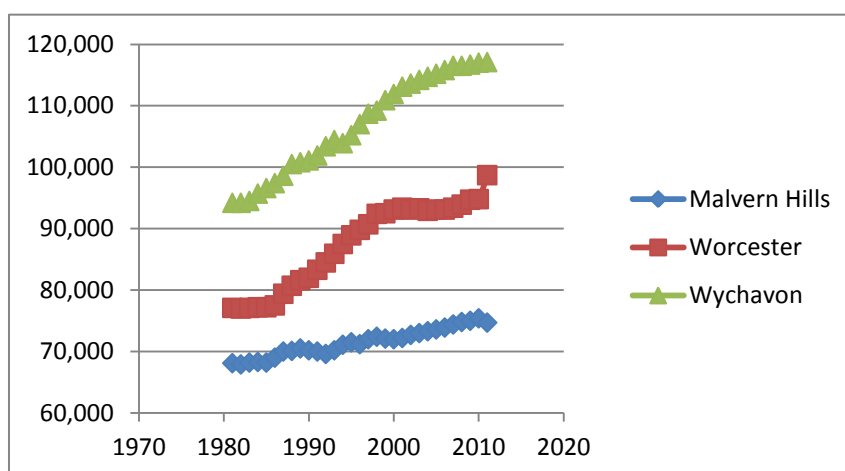
South Worcestershire Employment Locations

The employment spatial information indicated in this figure has been based upon data provided by Worcestershire County Council Statistics.



Worcester City constitutes the largest employment area at 62% (Economic Assessment).

The employment dispositions within the City are illustrative of the major centres. We also indicate some other key facilities together with the traffic black spots.



South Worcestershire Population growth 1981 - 2011

South Worcestershire Development Plan Proposed Submission Document

Representation Form (SWDP7)

Please return by **5.00pm** on the **22nd February 2013** to:
South Worcestershire Development Plan Team,
Orchard House,
Farrier Street,
Worcester
WR1 3BB

or

contact@swdevelopmentplan.org

Ref:

(For official use only)

Please complete a separate form for each representation you wish to make

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- Please complete Part B of this form for each representation you wish to make. You do not need to complete Part A more than once, *but please ensure you state your name or organisation as applicable at the top of each Part B form you submit.*
- Please refer to the attached guidance notes on making representations so that they address issues of legal compliance and/or soundness.

Please note that when representations are submitted only Part B of the form will be published. Contact details on Part A will not be published.

PART A

How we will use your details

The personal information you provide on this form will be processed in accordance with the requirements of the Data Protection Act 1998. It will be used only for the preparation of local development documents or any subsequent statutory replacement. However, your name and representations will be made publicly available when displaying and reporting the outcome of the consultation stage, and cannot be treated as confidential. Other details including your address and signature will be treated as confidential.

In agreeing to the holding of your information you are giving permission for your details, held on the database, to be shared between the three local authorities. If you have any concerns or queries relating to this process, please contact 01905 722233.

I agree that the contact details and any related responses can be held by the planning service departments of the three South Worcestershire local authorities. I understand that they will only be used in relation to the plan making process as required by the Planning and Compulsory Purchase Act 2004 and other planning-related legislation.

Part A

1. Personal Details*

*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	Mr	
First Name	Michael	
Last Name	Davis	
Job Title (if applicable)	Clerk to Lower Broadheath Parish Council	
Organisation (if applicable)	Lower Broadheath P.C & 'Save Elgars Village' SaEV	
Address Line 1	35 Oakfield Road	
Address Line 2	Malvern	
Address Line 3	Worcestershire	
Address Line 4		
Postcode	WR14 1DS	
Telephone Number	01684 569864	

E-mail address

mikedavis@worldonline.co.uk

Part B – Please use a separate sheet for each representation

Name or Organisation

Lower Broadheath Parish Council /Save Elgars Village 'SaEV'

3. To which part of the SWDP does this representation relate?

Paragraph

Page 59

Policy

SWDP 7

Proposals Map

If your comment does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

4. Do you consider the SWDP is legally compliant?

YES

NO

X

Please give details of why you consider the SWDP is not legally compliant. Please be as precise as possible.

It fails to meet the National Planning Policy Framework policy requirements for 'sustainability' in respect of the need to provide adequate infrastructure to serve some 23,200 new homes and employment opportunities in South Worcestershire.

See pages 2-32 of the NPPF – 'Achieving sustainable development'.

5. Please set out what change/s you consider necessary to make the SWDP legally compliant, having regard to the issue/s you have identified above. You will need to say why this change will make the SWDP legally compliant. It will be helpful if you are able to put forward your suggested revised working of any policy or text. Please be as precise as possible.

Provide evidence that all elements of infrastructure needed to support the development described in Paragraph 4 above will be in place before development commences.

Evidence is provided to show that it is affordable and adequate in respect of transportation, health care (primary and acute), flood and waste management, social care (including emergency services) needed to make the plan 'sustainable'.

6. Do you consider the SWDP to be sound?

YES

NO

X

If you consider the DPD is unsound is this because it is **not**:

1. Justified
2. Effective
3. Consistent with national policy
4. Positively prepared

X
X
X

7. Please give details of why you consider the DPD is unsound. Please be as precise as possible. If you wish to support the soundness of the DPD, please also use this box to set out your comments.

Past evidence indicates that a significant number of people occupying the 5,000 new homes planned to the south and west of Worcester and Malvern will commute to the east side of the river or North and South of the area as currently occurs to find employment.

The majority of these will use their own cars (as a result of many homes being located in areas not served by public transport) and will need to negotiate the very restricted river Severn crossing (Carrington Bridge) on the A4440 at Powick, a notorious bottleneck at all times of the working day, with approach roads liable to flooding. The very limited improvements indicated in annex 1 of the plan are inadequate to cope with existing traffic and no improvements are planned for the bridge itself constructed circa.1985. With an increase in population of 20% for South Worcestershire since that time, the bridge is already operating at 180% of design loading. The Worcester City bridge is only suitable for direct access to the town centre because of poor 'out of town links'. (See attached Plan)

The bottleneck and consequential gridlock on Carrington bridge is likely to deter new employment the area.

The Acute Hospital Facilities are already working to capacity and yet, rather than cater for expansion, the Health Trust is planning to entrench. In fact the facility at Worcester serves the whole county and not just South Worcestershire. Primary Care facilities are little better and in the 2010 Parish Plan 97% of residents considered that they could not cope with any additional development.

Water courses and rivers are inadequate to deal with increased accelerated 'run offs' and will result in more flooding of homes and road closures.

8. Please set out what change/s you consider necessary to make the DPD sound, having regard to the test you have identified at 6 above, where this relates to soundness. You will need to say why this change will make the DPD sound. It will be helpful if you are able to put forward your suggested revised working of any policy or text. Please be as precise as possible.

- Partial redistribution of the number of homes planned to the south and west of Worcester, including Malvern, to balance numbers with affordable infrastructure improvements.
- Alternatively bring forward the completion of the North West Worcester flood relief road together with an additional bridge crossing by not later than 2020, with a firm governmental promise of funding. This would make employment opportunities more attractive to investors to the west of Worcester an area that currently fails to attract employment because of poor and overloaded road communications.
- In addition, dual carriageway the entire A4440 complete with additional river

- crossing and flyovers at road junctions.
- Ensure expansion of health care facilities.
- Have a planned programme of water course improvements and further adoptions.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation on legal compliance and / or soundness and the suggested change(s) necessary to make the plan sound, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will only be made at the request of the Inspector, based on the matters and issues he / she identifies for examination.

9. If your representation is seeking change, do you consider it necessary to participate at the oral part of the examination?

NO I do not wish to participate at the oral examination **YES** I wish to participate at the oral examination

10. If you wish to participate at the examination, please outline why you consider this to be necessary

The SWDP still fails to address the importance of infrastructure. Its Authors know that the essential elements are unaffordable but the plan ignores this fact. They simply recommend the inclusion of **only** those items that may be affordable. This approach is insincere and unsustainable. **It will considerably inhibit the lifestyle of current and future generations. This is contrary to NPPF aims.**

This applies particularly to developments planned to the west and south of Worcester including Malvern. Relocation of homes to the east of the M5 motorway with its better infrastructure provision would offer some improvement.

Our concerns have been addressed to both the RSS and SWDP over a number of years supported by two parish plans and a further community plan currently being prepared but have been largely ignored during the consultation process . We have also explored the possibility of producing a 'Neighbourhood Plan' but understand that this can only deal with land usage issues and not those such as infrastructure which are again chosen to be ignored.

Failure to act on this important issue will result in the economic decline of South Worcestershire resulting in it becoming a 'congested backwater' with people travelling out of the area to find work, shop and socialise, achieving the opposite result to that intended. Is this the desire of our local and nationally elected members and paid officials?

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral part of the examination

Signature Date

