

Little Malvern and Welland Parish Council

Comment to PINS on 14/01269/OUT. Subject of Appeal Ref. APP/J1860/W/15/3131939

The Parish Council respectfully requests the Inspector to refuse the appeal for the reasons set out below.

Additional to the written representation made by the Parish Council on 22 October 2014 and to the verbal statement of its Chairman made to the meeting of MHDC Southern Area Development Management Committee on 18th February 2015 the Parish Council would comment thus:-

Sustainability – School Places

One of the key facilities contributing to Welland's status as a Category 1 Settlement in the SWDP Rural Settlement Hierarchy is the local primary school. But the school is forecast to be full for the next four years and beyond and WCC Children Services have stated:-
"In consideration, Welland Primary School is a popular small village primary school with less than 1 spare place per year group on average. Forecast numbers show intake of known children remaining high for the foreseeable future. The proposed development together with current commitments for housing development from within the area will adversely affect the ability to provide sufficient school places and maintain provision in line with class size legislation."

In spite of the contribution sought to increase the school capacity by 20 places the capacity will be challenged by the 107 new dwellings already approved in this village given the WCC 'on average' expectation of 0.028 pupils per dwelling per year group. The additional 107 + 50 dwellings will deliver 4.4 pupils to 7 year groups = 31 additional pupils.

The shortfall is likely to be greater still. The newness of the proposed homes and the predominance of 4 and 5 bed properties will probably generate more than the county average pupil numbers.

Sustainability – Remote Location

The site is over 1000 metres from the School and Post Office/Shop by footway navigable by pushchair, wheelchair or ageing legs, well in excess of the recommended 800m from design of streets for urban environments. Shorter routes are available by public right of way, over styles and across fields but the appellant does not control any land over which improved access may be established.

Sustainability – Social Cohesion

The proposed site is fully enclosed at the end of a cul de sac. The single access and distance from the centre of the village will not encourage social cohesion as is advocated by the NPPF

No Unmet Housing Need

It is considered that there is no evidence of potential unmet housing need in Welland or the District therefore no housing development sites are allocated in the emerging Welland Neighbourhood Plan additional to those set out in SWDP 59

The objectively assessed housing need to 2030 in South Worcestershire is 28,370 dwellings. The proposed SWDP makes provision for around 28,400 dwellings to meet this need, including 90 in Welland. These numbers have been agreed by the SWDP Examiner and MHDC, subject to further public consultation.

When the SWDP was published for consultation in 2011 there was no housing land allocated in Welland and only growth from small windfalls sites was anticipated. Development was seen as constrained by the influence of the AONB and the location of the settlement in open countryside. Following the 2012 SHLAA process a site for 10 dwellings was identified (Land adjacent to the former Pheasant Inn) and following approval on appeal of a nearby site for 50 houses (Lawn Farm, Drake Street), that and a further site for 30 houses (between the Old Post Office and Church Farm, Drake Street) were included in the Significant Changes to the submission document in 2014. Subsequently, approval has been granted on appeal for a further 24 houses (Marlbank Road) and for 3 single dwelling sites. Those 27 additions have not been included in the SWDP allocations.

Applications for a further 93 dwellings are currently pending determination

The SWDP was ultimately to deliver 90 new dwellings over 15 years to 2030, an increase of 18% in the units in the Parish and an increase of 28% in the units within or associated with the settlement boundary.

In addition to the SWDP allocations, current approvals will deliver 27 new dwellings by 2017 and a further 20 anticipated windfalls will bring that total to 137 by 2030, 47 more than the SWDP projection. 137 dwellings represents an increase in housing stock by 28% in the Parish and by 42% within the settlement.

In light of this, it is considered that there is no evidence of unmet housing need additional to the SWDP projections that must be accommodated within the emerging Welland Neighbourhood Plan. Therefore no housing development sites are allocated in that Plan additional to those included in the SWDP.

A further 50 dwellings would increase the housing stock from current levels by 38% in the Parish and 57% in the settlement; by any standards, an exceptional growth rate over 5 years.

Impact on Biodiversity – Protected Species

The Appellant has offered a revised Environmental Assessment Report focussing on Bats and Newts that has recommended mitigation measures for the threats to these species. The voracity of those findings and the suitability of the measures will be tested by others.

In the longer term, the impact of human activity, particularly the predatory influence of domestic pets and high volumes of vehicle movement will no doubt bring considerable disturbance to local wildlife. Although this application must be judged on its own merits it is proposed in the context of the cumulative impact of 130 houses where today there are open fields and a range of plant, animal and bird species.

Impact on Biodiversity – Green Infrastructure

This development, together with its northern neighbour, completes the urban barrier to the east of Mutlows Orchard and blocks the fertile valley between Castlemorton Common and Morton Green to the south and the fields surrounding Marlbank Brook to the north. The NPPF emphasises the criticality of green infrastructure for the support of biodiversity. This proposed urban barrier, re-enforced with garden fences, hard landscaping, predatory pets and garden chemicals is an inappropriate harm to biodiversity in the open countryside.

Impact on a Site of Special Scientific Interest.

NPPF 118 (bullet 2) acknowledges the potential cumulative impact of several developments on SSSI's.

This site completes an urban boundary, isolating the SSSI from the previously open fields to the east.

The impact of footfall and pawfall from potentially 130 dog walkers along the PRW through “the finest example of wild daffodils in Worcestershire” will not be mitigated by a buffer zone and has been raised as an issue by environmental consultees in relation to each of the previous two applications.

The drainage strategy for the proposal involves cutting existing ancient land drains nearby the SSSI and installing a SUD Scheme that drains water away from Mutlows Orchard against the natural slope of the land, as does the adjoining site. There has been no assessment of the impact, positive or negative of lowering the water table under those daffodils.

Impact on Public Rights of Way

The proposed redirection of rural rights of way to new roadside pathways both lengthens and complicates the routes and urbanises their surroundings. The amenity of the well-used recreational footpaths will be lost and it is questionable that residents will choose to walk the 1km to the village/school along estate roads and the frightfully busy A4104 along Drake Street.

Impact on the Landscape Character and Visual Amenity

All new development should respect and enhance the landscape setting and character of the Parish, ensuring that valued views and vistas and distinctive features of the natural, historic and built environment are maintained and, where possible, improved in accordance with NPPF 109, 110 and 113 and SWDP 25

In January 2015 the Parish Council commissioned a Chartered Landscape Architect to produce a Landscape Appraisal Report (LAR) in order to properly evaluate the value of the landscape and environment, to assess the suitability of locations for future development in a landscape context and to identify opportunities for protection and enhancement of the landscape amenity.

The LAR provides a formal context for considering the impact of any development in the study area to be used as the baseline for the assessment of Landscape Impact of any proposed development scheme.

In particular the study identifies sites that are more or less suitable for development in landscape terms and the nature of development that may be more or less suitable for each site with capacity. The LAR can be viewed at www.wellandplan.org.uk or copies are available from the Clerk.

This site lies in a parcel characterised as having a Low Landscape Capacity for development and would therefore be considered unsuitable unless the resulting harm were outweighed by more pressing factors.

The sensitivity of the site is heightened because it is readily visible from a major footpath that enters the AONB from the east. The Worcestershire Way Link path at Morton Green and the Malvern Hills AONB is less than 300m to the south of the proposed site and today commands views over the absolutely characteristic Settled Farmlands with Pastoral Land Use to the north end of the Malvern Hills and beyond to Woodbury and Abberley.

The Inspector at the appeal hearing for the adjacent Lawn Farm site (APP/J1860/A/13/2197037) acknowledged the perils of cumulative impacts on the Landscape Character and Visual Amenity both at close range and from further afield. While the argument that part of the landscape has already been changed from Settled Farmlands to urban housing estate is partially valid, to ignore cumulative impact is to encourage a marching army of development across open countryside claiming that the harm diminishes with every step.

This site is clearly visible from the ridge of the Malvern Hills and it would almost double the visible block of housing from that viewpoint. It is clearly visible from the AONB just 300m to the south. It is all around the network of public rights of way that cross Lawn Farm.

Scale and Density

Eliminating the access road to the site entrance and the SSSI buffer zone from the site plan reduces the habitation area to just 2 ha.

The density of 25 dwellings per hectare is substantially greater than any other housing development in the Parish except for the Mobile Home Park at Hook Bank. The proposal therefore does not conform to the character of the Rural Settlement.

The density of developments in Welland is:-

Within the Welland Settlement Boundary.	19ha	300 dwellings	16/ha
The Old Post Office development (approved) 19/ha		1.6ha 30 dwellings	
Lawn Farm I development (approved) 6/ha		8.2ha 50 dwellings	

Welland is a community that is highly dependent for access to employment, education, commerce and recreation on the motor car. The average household (including those 25% of households in single occupancy) has 1.8 motor vehicles and 60% of households owned 2 or more vehicles. 87% of people travelling to work did so by car or van. There was one vehicle for every 0.566 residents between the ages of 16 and 74¹. With local public transport

¹ 2011 Census data

facilities forecast to reduce, the provision of adequate space for motor cars is a critical sustainability factor and a density of 25 dwellings per hectare will not be compatible with that provision.

Local Plan Policies

The emerging South Worcestershire Development Plan may be attributed increasing weight as it passes through the later stages of the adoption process.

The subject appeal should be disallowed because the application fails to comply with the following policies of the SWDP.

SWDP 2
SWDP 5
SWDP 6
SWDP 21
SWDP 22
SWDP 23
SWDP 25
SWDP 59

Little Malvern and Welland Parish Council
Date: 22 September 2015