



Malvern Wells Parish Council

www.malvernwells-pc.gov.uk

Clerk: **David Taverner** MAAT Dip BA
Parish Office
1 Dockeray Avenue
Worcester WR4 0RX
Telephone: 01905 724486
<mailto:clerk@malvernwells-pc.gov.uk>

25th August, 2012

Gary Williams
Head of Housing and Planning
Malvern Hills District Council
The Council House
Avenue Road
Malvern
WR14 3AF

Dear Mr Williams,

South Worcestershire Development plan – Proposed significant changes

Malvern Wells Parish Council has given detailed consideration to the SWDP proposed significant changes document which was circulated earlier this month.

The SWDP incorporates the consideration of the very important issue of planning provision for the next twenty years and the resultant impact that it will have on the quality of life for residents and visitors both within Malvern and across the wider County Area during that period.

Your officers and Councillors will be aware that since the consideration and approval of the initial Preferred Options document, the Localism Act has received Royal Assent. The Government has published a revised National Planning Policy Framework (NPPF) (March 2012). Importantly this supersedes a significant amount of national planning guidance which was relied on in the initial development of the SWDP.

In particular here it is important that I draw attention to the comments of the Planning Minister Greg Clarke in a statement that he made during the launch of the revised NPPF:-.

"The purpose of planning is to help to achieve sustainable development. Sustainable means ensuring that better lives for ourselves doesn't mean that we make worse lives for future generations.

Our natural environment is essential to our wellbeing, and it can be better looked after than it has been"

Malvern Wells Parish Council strongly endorses those sentiments and has a clear mandate from its parishioners to protect and enhance the local area within which they reside. It is critical that these overriding principles should be at the forefront of the consideration of the proposals which are included within the SWDP proposals which are now being considered.

I particular I would draw your attention to pages **173 to 220** of the **Schedule of proposed Significant Changes** which are set out in the latest consultation document.

The revised NPPF states that:-

"Local planning authorities should give great weight to the consideration of the conservation of landscape and scenic beauty in National Parks and Areas of Outstanding Natural Beauty. These should have the highest status of planning protection in relation to landscape and scenic beauty"

The presumption in favour of sustainable development explains that the default answer of "yes" to proposed development should not apply... ***"where this would clearly compromise the key sustainable development principles in national planning policy, including protecting the Green Belt and Areas of Outstanding Natural Beauty"***

The Parish Council is pleased to note that your officers have recommended that the preferred option site **13/3 – 24 Dwellings at Upper Welland** should be deleted from the SWDP - especially in view of its prominent position in the Malvern Hills AONB and Conservation area.

In this context it is the Parish Council's firm belief that the preferred option site **13/4 – Land at Rothwell Road / Green Lane – 35 Dwellings** should also be deleted from the SWDP and we would urge the District Council to consider its deletion at this stage.

In common with site 13/3 site 13/4 also stands in a very prominent position in the AONB and a recent meeting of the Parish Council's Planning Committee, which was attended by a very large number of local residents, there was widespread opposition to the inclusion of that particular site.

It is also important to note that this site was last used as a recreational open pace and playing field.

Under its heading **"Promoting Healthy Communities"** Section 74 of the revised NPPF clearly states that:

"Existing open space, sports and recreational buildings and land, including playing fields should not be built on unless:

• an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

• the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

• the development is for alternative sports and recreational provision
loss"

So while the Parish Council is pleased to support the deletion of the Upper Welland site (**referenced 13/3**) it remains to be very concerned that the site (**referenced 13/4**) at Rothwell Road/ Green Lane is still being promoted in the SWDP proposals.

The inclusion of this latter site in the SWDP would seem to be directly in conflict with the Government's overarching, and clearly stated, intention to secure the protection of the AONB and is at odds with many of the reasoned justifications for the deletion of the Upper Welland site.

In view of this and because of the many objections that we have received to the inclusion of site 13/4 the Parish Council would urge the District Council to reject the inclusion of this site from the SWDP plans at this stage.

Using the Powers afforded to it under the *Localism Act 2011* the Parish Council has embarked on the preparation of its own Neighbourhood Plan. This will set out how a limited number of dwellings, which will meet targeted local housing needs, could be constructed in the Parish by limited infilling.

Not only will this help to preserve the character of the parish it will also help to conserve its current environment and the AONB, thus meeting the clearly stated requirements of the revised NPPF which the inclusion of site 13/4 would not.

In terms of the local infrastructure major improvements and changes to the road junctions in the area would be required and the addition of the 35 homes which are proposed for site 13/4 would inevitably lead to a major increase in local traffic volumes.

The Parish Council is fully committed to the prevention of urban sprawl, which would detract from the views from the ridge of the Malvern Hills and which would destroy the character of the AONB and to that end it strongly resists the inclusion of both sites 13/3 and 13/4.

It is our contention that any development of the immediate area should be undertaken in such a way that it meets the aspirations of the local community which will be incorporated into our emerging Neighbourhood Plan, as well as making a valid and properly evidenced contribution to local housing need.

The Council's over-arching objective is to maintain, preserve and enhance the existing character of the Parish and to this end we would not support the promotion of any other large scale sites for inclusion within the current SWDP proposals.

It is vitally important that planning controls are focussed on the need to foster and retain the natural beauty and unique characteristics of the AONB as well as the views from the Malvern Hills not only for local residents, but also for the many thousands of people who visit the area to enjoy its charms.

I should be grateful if you could arrange to present the content of this letter to the District Councillors for their consideration.

Yours sincerely,

David Taverner

DAVID TAVERNER

Clerk and Responsible Finance Officer