



# Malvern Wells Parish Council

[www.malvernwells-pc.gov.uk](http://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>

18<sup>th</sup> November, 2011

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

Dear Gary,

## **SOUTH WORCESTERSHIRE DEVELOPMENT PLAN PROPOSALS**

Further to the consultation on the SWDP Preferred Options consultation document, the Parish Council has debated the proposals and has also taken into account the views that have been expressed by members of the public both at our various Council and Planning Committee meeting and through comments made directly to the Council. These comments have been incorporated into the response below which relates to the Plan as a whole and, in particular, to Section 8 of the proposals and the impact on Malvern and the Wells.

### **Specific comments on preferred option sites in Malvern Wells**

Malvern Wells Parish Council has carefully considered the content of the South Worcestershire Development Plan (SWDP), in respect of the affect it will have on our own Parish, the wider District of the Malverns and the County of Worcestershire as a whole.

The document contains proposals for the potential development of two sites within Malvern Wells. There are identified as:-

SWDP 13/3 Land at Upper Welland Road, Upper Welland – 24 units

SWDP 13/4 Former Playing Fields, Green Lane – 35 units

Both of these sites lie within the Malvern Hills Area of Outstanding National Beauty (AONB) and the Upper Welland Site also rests within the Malvern Hills Conservation Area.

One of the Parish Council's (PC) key objectives is to help to promote and maintain both the characteristics both of the AONB and the conservation area, not only on behalf of the local community, but also to preserve the natural beauty of the area for all those who visit it. In particular it is vitally important to protect the AONB from any further large estate type development, such as the Fruitlands in Malvern, which has already had a devastating impact on the views looking down from and across the Malvern Hills.

In that context it is difficult to see how the proposed development at Upper Welland can help serve to foster these aims. The natural topography and the already overburdened and narrow road infrastructure in the immediate area should, in any event, preclude development at that particular site. The junction with the Wells Road, which is the main road out of this site, has seen several serious accidents in recent years.

Any such development in this area would put under threat the remaining section of the conservation area. Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that the local planning authority should "*designate areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance as Conservation Areas.*"

It is difficult to envisage how the development of the Upper Welland site (SWDP13/3) would help to preserve or enhance the conservation area in which it stands.

The PC is about to embark on the development of its neighbourhood plan which will form part of its vision for the future of the Parish. As part of this we would accept that there will be a need to respond to current and future housing need and that some, properly controlled, housing development will need to be undertaken. This directly contravenes current Malvern Hills local planning policies.

Whilst in principle the PC would consider supporting a suitably controlled small –scale infill development the Green Lane site (SWDP 13/4) should not be promoted as an "estate type" development. Any proposals that are put forward for the development of this site will need to be very carefully considered and we would certainly want to ensure that full and wide ranging consultation with local residents was undertaken as part of the review of any detailed planning application that was received. Improvements and changes to the road junctions in this area would be required and the addition of the 35 homes which are proposed would inevitably lead to a major increase in local traffic volumes.

However, it is unlikely that 35 dwellings would occupy the whole site and we would wish to see permanent proposals for the remainder alongside development proposals, so as to prevent future urban sprawl, which would detract from the views from the ridge of the hills.

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 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.

### **The link to Neighbourhood planning**

The SWDP proposals cross a twenty year planning timeline. The PC would see prefer to see a document which builds on local neighbourhood plans which will emerge and develop over a rolling five to ten year life cycle. This will allow the local community to play a leading role in the promotion and revitalisation of the local area, whilst playing a full part in the retention of its unique character, charm and elegance. The sustainability of such would, we believe, be enhanced by this more gradual and focussed approach as well as throwing sharper focus on infrastructure needs.

As a response to the aspirations of local residents we will aim to promote the improvement of local recreational and community facilities as part of the content of our own neighbourhood planning strategy.

### **Infrastructure**

In common with other respondents in the district the PC has concerns about the impact that the housing and industrial plans for South Worcestershire will have on the local transport infrastructure.

The local road infrastructure is not sufficient to meet the increased demand that will be placed on it and we do not believe that it is acceptable that there is no evidence in the SWDP proposals of properly costed and funded plans to respond to the existing over demand on the local road network. This situation will undoubtedly worsen if all of the SWDP proposals were to be implemented and indeed the entire local transport infrastructure will need significant improvement before the PC can support further development.

A serious re-think is needed on this particular issue.

Currently the main roads through Malvern Wells are very busy during rush hour periods and very heavily used throughout the day. It is well known that the current road links over the local river crossing bridges both at Worcester and Upton are running at almost twice the level of capacity for which they were originally constructed. Works to improve this situation will be extremely costly and it is unclear where funding for such works will come from. Contributions from developers will not be on a scale which will come not even close to meeting the likely funding gap.

Public transport throughout Malvern Wells and the wider area of the Malverns is, at best, limited and recent reductions to bus services in the district have exacerbated this situation.

### **District Issues**

The PC believes that the future development of Malvern should continue to reflect and reinforce the attractions of a community which has developed from a Victorian Spa Town and its vital links to tourism.

Economic growth must focus on the creation of new jobs in a changing environment. As well as boosting tourism there should be plans to develop new high -technology businesses and a service industry that will support the changing needs of the population.

Infrastructure improvements are required and are long overdue with Malvern being disadvantaged by the absence of a duelled Southern link road and a joined up Northern relief road around Worcester.

Additional growth on the scale envisaged for the Malvern area will mean that there will be a need for the development of more community assets such as schools, enhanced health facilities and the like. This will be brought into sharper focus with the more phased approach to planning strategy which would emanate from a five to ten year rolling programme which would be directly linked to the neighbourhood planning process. Critically this would engender a much better dialogue with the local community on planning issues

In summary the proposals incorporated in the SWDP proposals appear to swamp the Malvern Hills District with very large green field housing developments which do not cater appropriately for recognised local need, and which are totally unsupported by any firm and funded commitment to the necessary supporting infrastructure.

The PC remains clear in its belief that a properly thought through plan is needed for the future growth and prosperity of the District of Malvern Hills and its local communities, but much work needs to be done to promote these objectives and the current SWDP proposals do not appear to incorporate a coherent strategy that will achieve them.

Yours Sincerely,

*David Taverner*

**DAVID TAVERNER**

Clerk and Responsible Finance Officer