

## Regulation 16 Consultation on the Submitted Malvern Town Neighbourhood Plan RESPONSE FORM

Under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012, Malvern Town Council has submitted the draft Malvern Town Neighbourhood Plan to Malvern Hills District Council. In accordance with Regulation 16, Malvern Hills District Council would like to invite comments from organisations and individuals on the Neighbourhood Plan.

This consultation runs for six weeks from Friday 9<sup>th</sup> November to 5:00pm on Friday 21<sup>st</sup> December 2018.

If you wish to comment on the draft Malvern Town Neighbourhood Plan **please complete and return this form no later than 5:00 pm on Friday, 21<sup>st</sup> December 2018 to:**

**Email:** [policy.plans@malvern hills.gov.uk](mailto:policy.plans@malvern hills.gov.uk) , or by

**Post:** Planning Policy, Malvern Hills District Council, Planning Services, The Council House, Avenue Road, Malvern, Worcestershire, WR14 3AF.

The personal information you provide on this form will be held and processed in accordance with the requirements of the Data Protection Act 2018 and the General Data Protection Regulation 2018.

Please note that your name and comments will be made publicly available when displaying the outcome of this consultation and cannot be treated as confidential. Any other details, including signatures, private telephone numbers and email addresses will not be published on the Council's website, but the original representations with personal details redacted will be published. Your details will be retained in order for us to validate your comments. We will use these details to notify you of the progress on the Malvern Town Neighbourhood Plan. If you do not wish to be notified of the progress of the Neighbourhood Plan please let us know by ticking the appropriate box at the end of this response form.

Please fill in your details in the boxes below:

Full Name: Nicola Inchbald BA(Hons) DipTP MRTPI on behalf of Mr. James Milne

Organisation (if applicable): Inchbald Day Planning and Development Ltd

Address (including postcode):

Telephone number:

Email address:

Please state which part of the draft Neighbourhood Plan (i.e. which section, objective or policy) your representation refers to (please use a separate form for each representation):

Housing Section – in particular Policy MH1 & MH2

Design Section – Policy MD1

Green infrastructure – Policy MV1: Key Views and Figure 5.3 Visual Study –  
'Exceptional' Key Views Plan

Our clients welcome the removal of 'Draft Policy MH3: Infill Development' from the Consultation Version of Neighbourhood Plan. This would have been at odds with the requirements of the NPPF which requires best use of land within settlement boundaries and the presumption in favour of sustainable development.

We welcome the objective to "Support and encourage new housing of high quality and sustainable design that responds to local character adding to the overall quality of the Area and meets local housing need for both market and social sectors at an affordable price."

However, Policy MH1- Housing Mix seems to put an over reliance on the large allocated sites within the current SWDP and does not appear to recognize the valuable contribution that small sites can make to meet local housing needs. Indeed, paragraph 4.5 seems to suggest that 'windfall sites' would be subject to a higher level of scrutiny than other schemes. This is at odds with the fundamental premise of the planning system where all proposals should be considered on their merits.

Malvern needs appropriately located housing within the town to meet current and future needs of residents and the plan should better reflect this Vision (it is noticeable that the Vision does not refer to new housing).

Policy MH2 as currently drafted seems to place an increased weight on the consideration of the impact of new development on the amenity of adjacent residents and occupiers. Any planning proposal will be considered against many factors, including the potential impact on residential amenity. However, this policy as currently drafted, may be interpreted by some as a mandate to oppose **all** development. As it is in effect, a non sequitur, we suggest its removal from the policy.

Policy MD1 promoting the highest standard of design is welcomed but point 4. Is unclear what it means by

'Key components of the building design, which may have an effect on the aesthetic of the building, should be integrated into the overall design for the proposals to avoid the development having a detrimentally harmful impact on the character of the area'

Interpreted the wrong way this could mean that all new proposals would be of 'pastiche' in nature and not offering the best of modern design. This could be at odds with the ambition to build energy efficient housing as new technologies emerge. We would suggest that the point is rephrased to encourage the highest standard of modern design.

Policy MV1 and the associated Figure 5.3 recognises the importance of the AONB as it affects the setting of Malvern but we have a number of concerns. Firstly, it seeks to go beyond the boundary of the Neighbourhood Plan. This could mean that the findings of this NP could be at odds of those found within adjoining areas. We therefore, suggest that the diagram should only relate to the NP area. Secondly, the study seems to follow the roads into Malvern without reflecting the position or topography. Some parts of these roads offer no views in or out and Figure 5.3 should be amended to reflect this.

Please use a separate form for each representation.

**Future Notification**

Please state whether you would like to be notified of the decision on the Neighbourhood Plan proposal:

Yes

No

**Signature** [REDACTED] **Date** 21<sup>st</sup> December 2018

For and on behalf of Inchbald Day Planning and Development Limited.

Thank you for completing this form.