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To: Development Control Mailbox
Subject: Martley, Knightwick and Doddenham Neighbourhood Development Plan Regulation 16 Submission Version

Comments on the Martley, Knightwick and Doddenham Neighbourhood Development Plan, Regulation 16 Submission Version, as called for by Malvern Hills District Council in the formal consultation process.

Comments by Martin O'Brien, [REDACTED]

1.1. The Martley, Knightwick and Doddenham Neighbourhood Development Plan (MKDNDP) (Submission Version) deserves support and approval because it accords with the Government's Core Planning Principles as they concern rural settlements.

1.2. NPPF, "Core Planning Principles", para. 17: "...take account of the different roles and character of different areas... recognising the intrinsic character and beauty of the countryside and supporting thriving communities within it..." (para. 17, bullet point 5).

2. 1. The comments that follow are mainly concerned with Sections 4.0 "Landscape" and 5.0 "Built Heritage". These two aspects of planning are in many details connected and so my comments are placed together.

2.2. Under "Landscape" the MKDNDP refers to the Worcestershire County Council's "Landscape Character Assessment Supplementary Guidance" (LCASG) published in October 2011 and revised (presumably to take account of the NPPF) August 2012. LCA was urged by the Government in 2004 in PPS 7 "Sustainable Development in Rural Areas" as a means of arriving at criteria-based policies for the preservation of locally valued landscapes. It is treated in the NPPF as an established planning tool (e.g., NPPF, para. 170).

2.3. More use could be made of the County's LCASG in the MKDNDP to support its proposals. One example is the reference in the Principal Timbered Farmlands description to the occasional occurrence of low escarpments. The key Martley landscape feature consisting of The Nubbins/The Scar is, therefore, in itself a rare landscape feature, made even more notable by the fact that it exists "cheek-by-jowl" with, and so as a backdrop to, the rural community of Martley Village.

2.4. A further aspect of the LCASG that should be mentioned in the NDP is the impact of section 4.2 of the County's document. This section, though very considerably smaller than the rest of the document, nevertheless makes it unmistakeably clear that the LCASG is not merely the strategic work involved in researching and describing the various Landscape Types which are represented in Worcestershire.

2.5. Section 4.2 of the County LCASG stresses that the strategic element of the document is too large-scale to include all the important landscape features that are to be found below Land Cover Parcel level. The document accepts that such important features will not be picked up by the strategic level research. Below the latter level local community input is "vital".

2.6. According to the LCASG, the local community input vital for a complete landscape description of the County and for the recognition of important features is too detailed for the County Council to undertake. The County Council's role is the strategic one. It implies that District LPAs are best placed to initiate and coordinate the input into the global picture from local communities.

2.7. In the meantime the County Council suggest that LPAs use such local-community based documents as Parish Plans and Neighbourhood Plans for relevant information for development control purposes.

2.8. The County's LCASG, together with its Technical Manual, is one document. It cannot be used simply for its strategic element, even though this element occupies by far-and-away the greater part of its pages, if one's use of the document requires the study of individual sites below LCP level. It is, in

end effect, dishonest in such a case, to look only at the strategic level of LCA and conclude that, because this level does not show anything special about a particular site, then the site in question has no claim to landscape value. Such a conclusion is shown by the LCASG's section 4.2 to be entirely perverse. The input of the local community concerned must be ascertained.

2.9. In the case of Martley, its Parish Plan was submitted to the District Council in Spring 2012. It stated important attitudes to the Parish's landscape worth, including that of The Nubbins Escarpment. This information was not used by the District in 2013. It is to be hoped that the NDP will be adopted and ensure for the local communities involved that their opinions on the landscape features of their parishes will be respected.

2.10. The MKDNDP is to be applauded for its intention of ensuring protection of the Martley Conservation Area. The Conservation Area's setting, as defined in the Appraisal and Management Strategy adopted by Malvern Hills District Council in 2006, suffered a severe degrading in 2013. It is to be hoped that, through the NDP and through increased awareness on the part of Martley's residents of the value of this heritage asset, the Conservation Area and its setting will be protected.

2.11. Within Martley, a key feature both as regards landscape amenity and heritage value remains The Nubbins/The Scar Escarpment.

2.12. The Nubbins Quarries, as is confirmed by the Conservation Area Appraisal report, supplied building stone for the Parish Church and other listed buildings in the Parish. The Martley Tithes map of 1843 shows in front of it the large field, still identifiable today, called "The Quarry Piece", through which the stone was taken to various destinations.

2.13. One aspect of The Nubbins Quarries concerns the Conservation Area's special interest, as defined in the 2006 Appraisal document. This aspect is the survival in existing buildings of original, locally-sourced materials. In the case of timber, bricks and clay-tiles, these sources are no longer readily visible. But in the case of the sandstone building blocks for at least parts of the Church and other listed buildings the source, which is none other than The Nubbins, is still readily visible to local inhabitants, visitors and people passing through the Village. It is therefore a matter of conserving the significance of the Conservation Area, as well as of simple historic interest and bonding with the past, that The Nubbins Quarries remain readily visible to as many people as possible.

2.14. The Conservation Area 2006 Appraisal also highlighted the geological significance of The Nubbins/Scar, as marking the point of geological transition between the two different Landscape Character Areas lying either side of the River Teme. A further geological significance of The Nubbins is also underlined in "The Geopark Way" (produced by the Herefordshire and Worcestershire Earth Heritage Trust) on its page 66.

2.15. In these circumstances, it is hard to understand why the exposed sandstone faces of The Nubbins are not in the District's list of geological sites of special interest. It is to be hoped that the NDP's mention of this aspect of The Nubbins' importance will cause it to be included in the District's list and to be given suitable protection.

2.16. In spite of the housing-estate that now stands in front of it, The Nubbins remains a fine landscape feature of which any village in the country would be proud. The protection advocated for it by the MKDNDP, it is to be hoped, will help ensure that it will continue to be so in future. In support of the importance attached to The Nubbins by the NDP there is the Freedom of Information response from the District's FoI Office in December 2016 to the effect that, when the District Council in 2006 declared The Nubbins/The Scar "a prominent and attractive landscape feature", it did so on the strength of "criteria-based policies" accepted by the then Planning Inspector as meeting the requirements described by the Government in PPS 7 (see 2.2 above).

3.0 It would be helpful if a note on Category One Villages along the following lines could be included at a suitable point in the MKDNDP.

"Note on Category One Villages

3.1. There is a certain logic in allocating future rural housing development primarily within or adjacent to the settlement boundaries of Category 1 villages, because of the level of their existing services. The precise saving in petrol and diesel will vary according to the overall travel patterns of each individual affected.

3.2. However, the policy carries within itself the potential of contradicting other important SWDP policies and could lead to irrational decisions. These potential contradictions are summarised at points 3 - 11 below.

3.3. SWDP 25, "Landscape Character", Reasoned Justification", para. 1 points out the significant fact that landscape is an important factor in the choices that people make about where they live and work and that South Worcestershire's distinctive landscape plays an important role in the high quality of life of most residents. It is vital therefore that the local landscape is protected, for the general wellbeing and the economic viability of south Worcestershire.

3.4. It follows necessarily from point 3.3 above that, if expansion of a Category 1 village were to spoil a site of high landscape value, then the expansion should not take place, at any rate not on that site. Because:

- (i) Those who were brought up in the village and have remained there to enjoy the local environment have a right not to be obliged to relocate elsewhere to find the same quality of life;
- (ii) Those who have moved to the village precisely to enjoy the countryside around it also have a right not to be obliged to move elsewhere to preserve their quality of life;
- (iii) The economically valuable tourist industry is damaged;
- (iv) The District hopes to attract talented new people to the District through, among other things, the distinctive local landscape. The District would be saying, in effect: "Come and enjoy our distinctive local landscape. Come and live in a new, modern house which destroys a fine example of it." This would be illogical.

3.5. More generally, the excessive reliance on Category 1 villages to absorb more housing development changes the essential character of the villages concerned from rural to urban. Inevitably, this fundamental change affects the quality of life of many more individuals than if it had occurred in a lower category village or uncategorised village. The District should be pressed to do precise work on the "critical point" at which size of population in a rural settlement turns it into a stranded and townless suburb.

3.6. Development should not take place **anywhere** on Best and Most Versatile Agricultural Land. Respectable research indicates that, merely to feed the increased population forecast for 2030 and to achieve **some measure** of independence from fossil fuels the UK needs about 70% more agricultural land, of whatever grade, than it actually possesses. Contrary to the Planning Inspector's superficial approach to this question, no more BMVAL can responsibly be sacrificed to development.

3.7. It would be illogical to adopt the following reasoning:
"Good farmland is one of the most promising means of replacing fossil-fuels. In the meantime, we will save some fossil fuel-consuming journeys by putting new housing within or near to settlement boundaries. We will do this even if it means building on best farmland."

3.8. Similar arguments apply to heritage assets (SWDP Policies 6 and 24) as apply to sites of landscape value. Giving people a sense of belonging to a place and of bonding with the past is incompatible with new development that masks previously visible heritage assets.

3.9. Building land must be used to its full capacity (SWDP Policy 13). Where respect for heritage assets and their setting entails the uneconomic use of a site, the proposed development must be rejected on that site.

3.10. Continuing development within or adjacent to the settlement areas of villages lying within landscape type Principal Timbered Farmlands would seem to contradict a defining characteristic of

this landscape type, namely, its "lack of strong settlement nuclei" and its "dispersed settlement pattern". "Modern development favouring groups or clusters of new houses would not be appropriate in this landscape".

3.11. The schools in Martley, a Category 1 village, particularly the Chantry High School, serve a wide area. They were built with this very purpose in mind. It is illogical, therefore, to use the presence of the schools within Martley as a reason for building more houses in Martley than Martley itself requires or wishes.