

## Regulation 16 Consultation on the Submitted Welland Neighbourhood Plan RESPONSE FORM

Under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012, Welland Parish Council has submitted the draft Welland 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 Monday 26 June to 23:59 on Monday 7 August 2023.

If you wish to comment on the draft Welland Neighbourhood Plan **please complete and return this form no later than 23:59 pm on Monday 7 August 2023 to:**

**Email:** [neighbourhoodplanning@malvern hills.gov.uk](mailto:neighbourhoodplanning@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 Any other details, including signatures, private telephone numbers and email addresses will not be published on the Council's website, but the original representations with personal details redacted will be published.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 Welland 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: Rachel Farquhar and Ashley Fawke

Organisation (if applicable):

Address (including postcode):

[REDACTED]

Telephone number:

Email address: [REDACTED]

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):

Policy H4: Site allocation for 13 dwellings on land north of Cornfield Close

Please use the space below to make comments on this part of the Neighbourhood Plan.

#### 1. Privacy and security

Policy DB1 point 4 sets as criteria for new development – to not create unacceptable harm to the amenity of adjacent residents and occupiers. A lack of appropriate response to the issue of privacy and security would create unacceptable harm to both existing and new residents.

We are pleased that some consideration has been made to the privacy and security of residents in Phases 1 of Cornfield Close, as well as occupants of the proposed new development - Point 5.10.41 refers to a “landscape buffer adjacent to no.24 Cornfield Close”. However, we remain concerned by the impact of the development for new and existing residents so would suggest incorporating substantial additional hedging and trees, particularly between the proposed development and Phase 2 (Barleycorn Fields). There is a newly established hedgerow between plots 11, 12, 13 & 14 of Phase 2 and the proposed new development but it is insufficient to provide the necessary privacy and security; being in its infancy, failed in places and with the potential to thin out over winter. We suggest the inclusion of substantial hedging and a treeline on the edge of the proposed new development is needed. This could be achieved by including a buffer at the edge of the new development, running parallel to the current attenuation access route, essentially widening it, thereby creating a ‘biodiversity corridor’ that would not only increase the gap between the existing and proposed developments but allow formation of a consistent wildlife corridor from the orchard through to the retained open countryside shown to the north in Figure 5.7.

Additionally, windows and gardens could be orientated to achieve mutual privacy and we hope houses and garden would not be located back-to-back as that would enable clear lines of sight into homes. Alternatively, single storey buildings could be located in the areas bordering existing houses.

#### 2. Existing landscape and habitats

Policy DB1 point 5 sets as criteria for new development – to not cause unacceptable harm to land or features that have important biodiversity, landscape character, visual amenity and heritage value.

Point 5 of Policy H4 refers to the development needing to provide at least a 10% net gain in biodiversity value following development. It is not immediately clear how that can be achieved although Policy B1 refers to “on-site measures “and “off-site gains”. Any future planning should include provision for how this will be monitored.

We support the ambition of allocating 40% of the gross site to Green Infrastructure, but we suggest that a substantial portion of the allocation should be placed on the western side of the new development, creating a buffer between the new development and existing attenuation access route (which would equally address the privacy concerns set out above). This would afford the ability to create a wraparound biodiversity corridor, utilising the existing attention access route plus additional buffer to the west, designated SSSI land to the north, the orchard to the south and finally the brook to the east.

Moreover, allocating these areas as such to Green Infrastructure would ensure that the whole development (Cornfield Close Phases 1, 2 and 3) does not look 'clustered' when viewed from Malvern Hills – a point expressly dealt with in the NDS.

### 3. Drainage and access

Policy DB1 point 5 sets as criteria for new development – to provide safe and suitable access to the site for all users.

Residents of Phases 1 and 2 are reliant on one access route via a private road that is not suitable for heavy volumes of traffic. It is narrow in places with tight corners. We would require steps to be taken to ensure the private road remains safe whilst serving heavy construction traffic in the short-term, as well as the increased levels of traffic from the three developments in the long-term.

Additionally, given this is a private road to which management companies currently contribute, consideration should be given as to how the management companies will be reimbursed for any damage and wear and tear caused to the private road by heavy construction traffic.

SSH5 outlines one objective of the Plan being to ensure the design and location of new development is resilient to the effects of climate change and flooding.

Poor surface water drainage has been reported by many residents of Phase 2 (including plots 11-14 who will be adjacent to the proposed new development). Gardens are frequently waterlogged following poor weather. The current SuDS provision in the northern part of Phase 2 is ineffective, which indicates that reliance on the suggested 0.42ha of Green Infrastructure, located again, to the north of the proposed new development, would be equally ineffective. The new development is likely to exacerbate the issue; removing permeable surface areas required for excess water to be safely directed away. The natural gradient of the land will mean this becomes an even bigger issue for whichever houses find themselves at a lower level – either those existing in Phase 2 or in the proposed new development.

Extra surface area for soakaway could be achieved by introducing the aforementioned biodiversity corridor, ensuring sufficient run off area between both the new development and Phase 2.

### 4. Public transport and local facilities

Welland currently lacks sufficient public transport links and demand for this will increase with further development. We suggest future development requires consideration of increased access not just within the village (as discussed by Policy C2) but to local amenities within Malvern, Upton and Ledbury.

The 'Vision for Welland in 2041' states that "the village will be linked to nearby towns by a range of transport alternatives". As an example, Great Malvern Station is only 5 miles away and provides excellent links – particularly for commuters – to Hereford, Birmingham and London but is currently only accessible by car, with no direct bus links and no active transport infrastructure links.

As such, we welcome adoption of Policy I4 as a first step, with the potential to provide an active travel and cycle route, between Welland and Malvern, that would avoid reliance on the B4208 and hopefully encourage the take up of active travel. Supplementing this with affordable public transport for all would seem essential to achieving the Vision. However, we still believe that considerable work needs to be done to build further transport links, with the hope it will taper the current reliance on cars.

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** ...20/08/2023.....

Thank you for completing this form.