

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 , 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 Any other details, including signatures, private telephone numbers and email addresses will not be published on the Council's website, but the original representations with personal details redacted will be published.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: Emma Hancox

Organisation (if applicable): Worcestershire County Council

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):

Policy 5.7

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

Policy 5.7 – The policy wording does not meet the stated objective ENS4: To protect and enhance the historic environment.

The policy specifically limits the definition of non-designated heritage assets to “a building or structure on the Local List following adoption by Malvern Hills District Council”. This is at odds with the broad definition in Government guidance “Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets.” It is clear from the Government guidance, and the wording within NPPF, that non-designated heritage assets (NDAs) include a broad range of features, including historic landscapes, designed landscapes and archaeological assets. The policy requirement that buildings and structures should already be on the Local List is also at odds with national policy. A NDA can be identified at any point in the planning process. It does not have to already have been identified and placed on a list in advance. The wording in brackets in the first paragraph should be removed, or modified to make it clear that NDAs can be identified in a number of ways, including but not limited to, those on the Local list.

The policy, and the wider Plan, fails to mention the Historic Environment Record. The evidence base for the Plan does not include a search of the Historic Environment Record to underpin the policy. Parish councils are strongly advised to consult with their local Historic Environment Record by both County Councils and Historic England. Historic Environment Records can provide a range of individual records for known heritage assets (including archaeological sites, historic buildings and structures and landscape features) as well as information associated with thematic and character-based studies, that would support clearer understanding of the area’s historic environment, and planning issues that need to be addressed through informed plan policies. A NDP is an opportunity to highlight specific local heritage that makes a positive contribution to the plan area, and that should be protected or enhanced.

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  Date15/08/2023.....

Thank you for completing this form.