

Powick Neighbourhood Plan 2025-2041
Regulation 16 Consultation
Malvern Hills District Council Officer Comments
20 July 2026

1.0 Overview

- 1.1 These officer comments are made on behalf of Malvern Hills District Council (MHDC), as the Local Planning Authority, on the Regulation 16 Powick Neighbourhood Plan for consideration by the Independent Examiner. The consultation ran from 8 June 2026 to 20 July 2026. The MHDC officer's comments made regarding the Regulation 14 consultation are also provided for information at Appendix 1. MHDC is pleased to note that the changes and updates that were suggested at the Regulation 14 stage were implemented by the Qualifying Body, Powick Parish Council, when drafting the Regulation 15 submission version of the Neighbourhood Plan.
- 1.2 MHDC is supportive of the Parish Council's preparation of the Neighbourhood Plan and of the plan period from 2025 to 2041.
- 1.3 The Neighbourhood Plan has been prepared during a period of transition in local plan making from the adopted SWDP (2016). The South Worcestershire Development Plan Review (SWDPR) was submitted to the Planning Inspectorate for examination in September 2023. The Examination in Public began in March 2025, with the Inspector's final report received in early March 2026 and the SWDPR adopted by the South Worcestershire Councils on 26 March 2026.
- 1.4 The Regulation 15 submission version of the Neighbourhood Plan has been drafted to reflect the policies in the newly adopted SWDPR and has been able to consider those strategic policies identified by WDC published on the council's Policy webpage here [[Neighbourhood Planning - Malvern Hills District Council](#)].

2.0 Meeting the Basic Conditions

- 2.1 It is not for MHDC to say whether the Regulation 15 version of the Neighbourhood Plan has met the basic conditions, however, the following points are made for consideration as part of the independent examination.

3.0 Having Regard to National Planning Policy

- 3.1 The Neighbourhood Plan has been prepared against the latest NPPF published in December 2024. As the Neighbourhood Plan was submitted at Regulation 15 prior to the publication of the latest draft version of the NPPF it will continue to be examined against the policies in the 2024 NPPF.

4.0 Being in General Conformity with the Strategic Policies Identified in the SWDPR

- 4.1 MHDC have identified a list of strategic policies in the adopted SWDPR which Neighbourhood plans should be in conformity. The district council is satisfied that the Qualifying Body has considered these policies in drafting the Neighbourhood Plan with these strategic policies in mind. However, some specific points and observations are raised in the table below for the consideration of the examiner.

5.0 Table of Contents

Chapter/Section	Comments
Chapter 1: Setting the Scene	This chapter outlines the Neighbourhood Plan process and how they can form a part of the overall plan for the district. The document is logically set out, and the contents are clearly signposted. The Neighbourhood Plan identifies that the most recent 2024 NPPF is applicable and confirms that the plan will run from 2025 – 2041 to be co-terminus with the SWDPR.
Chapter 2: Powick Neighbourhood Area	This chapter provides a clear outline about the Neighbourhood Area, outlining the socio-economic and environmental profile, as well as the settlement layout. The context provided is useful and supported by MHDC. Minor grammatical errors highlighted at the Regulation 14 stage have been corrected.
Chapter 3: Vision and Objectives	The chapter is concise and clearly signposts to relevant policy areas of the Neighbourhood Plan that will support and deliver the vision.
Chapter 4: Environment	Policy PWK1: Design. This policy reflects the principals outlined within SWDPR 05 Design and Sustainable Construction and SWDPR 28 Design in the SWDPR. We welcome the focus on supporting innovative and sustainable development, whilst also respecting the character of the locality. The Powick Design Code document is welcomed and the wording of SWDPR 05 and SWDPR 28 now provides stronger support for design codes going forward. Policy PWK2: Heritage. This policy is consistent SWDPR 09 and SWDPR 33 in the SWDPR. Policy PWK3: Powick Village Conservation Area. This policy supports the aspirations of the Powick Conservation Area appraisal in protecting the existing built environment within the historic core of Powick Village. It aligns with SWDPR 09 and SWDPR 33 in the SWDPR. Policy PWK4: Landscape character. The policy is aligned with SWDPR 34 in the SWDPR. MHDC supports the aims of this policy to preserve and enhance the landscape character within the neighbourhood area. Policy PWK5: Powick/Collett's Green Local Gap. MHDC support the principle of this policy to ensure that a coalescence between Powick and Collett's Green does not occur. Following the SWDPR examination, a new policy regarding Significant Gaps has been introduced. The text within Policy PWK5 has been adjusted to reflect the new Significant Gaps policy SWDPR 08. Policy PWK6: Key views. The key views outlined within this policy are supported and justified. They are easy to interpret with the use of Plan 4: Key views. Policy PWK7: Local Green Space. The local green spaces identified are supported and justified. We welcome the inclusion of the description that "development will be managed in a manner consistent with that applicable to designated Green Belt", and we consider that this is in line with the NPPF, and the criteria in Planning Practice Guidance.

	Policy PWK8: Renewable and low carbon energy. This policy is supported and reflects MHDC objectives in the 2020 Destination Zero Plan.
Chapter 5: Community Facilities	Policy PWK9: Community Facilities. MHDC supports this policy, and we consider that the identified community facilities cover important services and facilities within the neighbourhood area. We also support the provision of a new convenience facility within Collett's Green and Powick, though any proposal would need to reflect the requirements of SWDPR 47 in the SWDPR. We also support the enhancement for outdoor recreation and play, and new facilities, such as a youth club.
Chapter 6: Housing	As per comments at the Reg 14 stage, paragraphs 6.1 to 6.4 have removed reference to the Annexe E, as this has been deleted from the SWDPR. The housing requirement for the Neighbourhood Area is now zero with the Main Modification to SWDPR03. This is because the SWDPR is meeting all its housing requirement through allocated sites. It is noted that no further allocations have been put forward in the Neighbourhood Plan. Policy PWK10: Housing mix. MHDC supports the aims for this policy, and the focus on ensuring that there is greater provision for housing that reflects the communities' requirements. The policy is supported by community survey results and the 2021 SHMA update prepared for the SWDPR. MHDC propose that the wording relating to live/work in both the policy and supporting text should include reference to SWDPR 15 C and that any development proposals should be in conformity with the requirements of the SWDPR. Policy PWK11: Design of new housing. Policy PWK11 has been changed to 'Design of New Housing' and this is supported and ensures continuity within the text. This policy is aligned with the SWDPR policies relating to design. We also support the inclusion of a focus on incorporating sustainability measures within new housing. Policy PWK12: Householder development. This policy is supportive of the SWDPR policies relating to design, and the Wychavon Design Code SPD (2026). Policy PWK13: Land south of Old Malvern Road. MHDC supports the aspirations of this policy in assuring a high quality and sustainably designed development. The policy is aligned with the relevant development management policies in the SWDPR. The site remains allocated within the SWDPR, and the policy has been updated to reference the SWDPR.
Chapter 7: Economic Development	This policy is supported and aligns with SWDPR 14 and 15 employment policies, as well as the NPPF, that both seek to support economic development in rural areas. The contents of this chapter are noted and supported.
Chapter 8: Delivering the Neighbourhood Plan	The contents of this chapter are noted and supported.
Chapter 9: Community Actions	The contents of this chapter are noted and supported.

Plans	Noted.
Appendix A: Evidence Base	The evidence base is proportionate to and supportive of the SWDPR policies.

6.0 Conclusion

- 6.1 The Parish Council have chosen to have their Neighbourhood Plan adopted against the new SWDPR (adopted March 2026). The independent examination, referendum and adoption will therefore take place against the SWDPR.
- 6.2 Overall, MHDC considers that the Powick Neighbourhood Plan aligns with the South Worcestershire Development Plan Review (March 2026) and the NPPF. MHDC considers that the relevant policies and explanatory text are supportive of the requirements under the LURA. Although it is acknowledged that it is for the Examiner to consider whether the Neighbourhood Plan meets the Basic Conditions and make any recommendations accordingly. MHDC welcome the modifications made to the Regulation 15 version of the Neighbourhood Plan, and it is felt that these reflect the comments we raised at the Regulation 14 consultation, and the additional updates made to the Neighbourhood Plan align with the latest NPPF.

Powick Neighbourhood Plan 2025 - 2041
Regulation 14 Consultation
Malvern Hills District Council Officer Comments
8 December 2025

7.0 Overview

- 7.1 These officer comments are made on behalf of Malvern Hills District Council (MHDC), as the Local Planning Authority, on the Regulation 14 draft Powick Neighbourhood Plan for consideration by the Independent Examiner. The consultation ran from 27 October to 9 December 2025.
- 7.2 The draft Neighbourhood Plan has been prepared during a period of transition in local plan making from the adopted SWDP (2016) to the reviewed SWDP. The latter, referred to as the South Worcestershire Development Plan Review (SWDPR), was submitted to the Planning Inspectorate for examination in September 2023. The Examination in Public began in March 2025, with most of the hearing sessions being held over March-April. The examination included a further hearing session on 4 September 2025. The SWC are anticipating the adoption of the reviewed SWDP in spring 2026 following receipt of the Planning Inspectors final report.
- 7.3 The Inspectors published their interim letter (EXAM99) on 7 July and their post hearing letter (EXAM118) on 10 October determined that the Plan is likely to be capable of being found legally compliant and sound. MHDC will be able to consult on Main Modifications to the Plan in early 2026, allowing the Inspectors to then issue their final report and subsequent adoption of the new SWDP for early spring 2026.
- 7.4 However, the Inspectors have found that Annex E, relating to housing numbers for Neighbourhood Areas, of the SWDPR is unsound and directed that it should be removed from the Plan as a Main Modification. This means the housing supply position in respect of the Neighbourhood Plan area set out in Annex E is no longer relevant. MHDC has determined the housing requirement for designated Neighbourhood Areas to be zero and this is included as a Main Modification to SWDPR03 The Spatial Development Strategy and Settlement Hierarchy.
- 7.5 However, it should be stressed that Neighbourhood Plans should be positively prepared and, therefore, the Parish Council should consider allocating a site in accordance with NPPF para 74 and of a size that reflects the requirements in NPPF para 73a. In doing so the Neighbourhood Plan would also benefit from NPPF para 14 in the event that Malvern Hills is unable to demonstrate a 5-year housing land supply post adoption of the SWDPR.
- 7.6 In the event of the Parish Council choosing to allocate a site at this stage it would be necessary to undertake a Call for Sites exercise, ask MHDC to update the SEA/HRA screening opinion and undertake a further focused consultation on the site as part of the Regulation 14 stage.
- 7.7 Further to this, the Neighbourhood Plan would also have to include policies in relation to housing requirement, and location of residential development, in addition to an allocation to fully benefit from the provisions of NPPF paragraph 14, in the event Malvern Hills are unable to demonstrate a 5 year housing land supply.

8.0 Meeting the Basic Conditions

- 8.1 It is not for MHDC to say whether the Regulation 14 version of the Neighbourhood Plan has met the Basic Conditions, however, the following points are made for consideration as part of the independent examination.

9.0 Having Regard to National Planning Policy

9.1 The Neighbourhood Plan has been developed with consideration of the latest National Planning Policy Framework (NPPF). It should be noted that the Government is publishing an update to the NPPF in December 2025 for consultation. Consequently, the Neighbourhood Plan may need to be amended accordingly to reflect any changes to national planning policy prior to the Regulation 15 submission stage later in 2026.

10.0 Being in General Conformity with the Strategic Policies Identified in the SWDP

10.1 MHDC have identified a list of strategic policies in the adopted SWDP which Neighbourhood Plans should be in conformity. However, given that the Powick Neighbourhood Plan will be adopted against the SWDPR then it is against the strategic policies in the new Local Plan that it will be partly examined against. Therefore, for the Regulation 15 submission version of the Powick Neighbourhood Plan the text should reference the policies in the SWDPR and be in general conformity with the strategic policies in the new Local Plan. MHDC can provide an updated list of strategic policies as part of this representation. That said given that the strategic policies between the SWDP and SWDPR are broadly similar, then the draft Regulation 14 version of the Neighbourhood Plan should still be broadly aligned with the forthcoming SWDPR.

10.2 References to SWDPR policies are as they will appear in the adopted SWDPR, as the Neighbourhood Plan will be examined against the new local plan.

11.0 Specific Comments

11.1 However, some specific points and observations are raised in respect to the content and the table below for the consideration of the Parish Council.

11.2 Table of Contents

Chapter/Section	Comments
Chapter 1: Setting the Scene	This chapter outlines the Neighbourhood Plan process and how they can form a part of the overall development plan for the district. The document is logically set out, and the contents are clearly signposted. There is opportunity in this section to clarify the version of the NPPF that is applicable. In paragraph 1.13, it states that there is an "Allocation of an Area of Informal Recreation south of Jennet Tree Lane, Deblins Green." Following a Main Modification to this policy within the SWDPR, this allocation will now be removed, therefore, this text can be deleted. It is important to clarify the revised timings for the SWDP Review adoption, which has altered from December 2025 to Spring 2026. The text should be updated to reflect the status of the SWDPR for the final draft version of the Neighbourhood Plan. It is clear from paragraph 1.15 that the Neighbourhood Plan will be continually updated prior to the examination and eventual adoption, so that it accurately reflects that of any further review of the SWDPR. As the finalised Main Modifications document is now published, ahead of the Council meeting on 16 December 2025 we would recommend the Parish Council review this and update each area of the neighbourhood plan accordingly, so that it reflects the latest SWDPR policies. The intention is to consult on the main modifications on the 7th January and following receipt of the Inspectors final report, adopt the SWDPR by the week beginning 23rd March 2026.
Chapter 2: Powick Neighbourhood Area	This chapter provides a clear outline about the Neighbourhood Area, describing the socio-economic and environmental profile, as well as the settlement layout. The context provided is useful and supported by MHDC.

	There are minor grammar errors within paragraph 2.9, it should instead read as: "In 2021, 81% of homes in the Neighbourhood Area were either owner-occupied or held in shared ownership, more than for in Malvern Hills District (Figure 4). Conversely, the proportions of social housing and privately rented homes were both lower than at District level." The last sentence of Paragraph 2.11 should read as: "Community survey responses point to concerns about the frequency of these services and their impact on social and recreational trips outside of the Area."
Chapter 3: Vision and Objectives	The chapter is concise and clearly signposts to relevant policy areas of the Neighbourhood Plan that will support and deliver the vision.
Chapter 4: Environment	Policy PWK1: Design. This policy reflects the principals outlined within SWDP 21 in the adopted local plan and now SWDPR 05 Design and Sustainable Construction and SWDPR 28 Design in the SWDPR. We welcome the focus on supporting innovative and sustainable development, whilst also respecting the character of the locality. The Powick Design Code document is welcomed and the wording of SWDPR 05 and SWDPR 28 now provides stronger support for design codes going forward. Policy PWK2: Heritage. This policy is consistent with SWDP 6 and SWDP 24 in the adopted local plan, and SWDPR 09 and SWDPR 33 in the SWDPR. Once the new SWDPR policies map is released, there will need to be an update to footnote 7, that falls within para 4.6. Policy PWK3: Powick Village Conservation Area. This policy supports the aspirations of the Powick Conservation Area appraisal in protecting the existing built environment within the historic core of Powick Village. It aligns with SWDP 6 and SWDP 24 in the adopted plan, and SWDPR 09 and SWDPR 33 in the SWDPR. Policy PWK4: Landscape character. The policy is aligned to SWDP 25 in the adopted local plan, and SWDPR 34 in the emerging SWDPR. MHDC supports the aims of this policy to preserve and enhance the landscape character within the neighbourhood area. Policy PWK5: Powick/Collett's Green Local Gap. MHDC support the principle of this policy to ensure that a coalescence between Powick and Collett's Green does not occur. Following the SWDPR examination, a new policy regarding Significant Gaps has been introduced. The text within Policy PWK5 should be adjusted so that it reflects the new Significant Gaps policy SWDPR 08 as identified within the Main Modifications consultation document. Paragraph 4.23 – correct syntax/typo error – "Local Gap" Paragraph 4.24 – correct syntax/typo error – "significant gaps included to" Policy PWK6: Key views. The key views outlined within this policy are supported and justified. They are easy to interpret with the use of Plan 4: Key views. Policy PWK7: Local Green Space. The local green spaces identified are supported and justified. We welcome the inclusion of the description that "development will be managed in a manner consistent with that applicable to designated Green Belt", and we consider that this is in line with the NPPF, and the criteria in Planning Practice Guidance. Policy PWK8: Renewable and low carbon energy. This policy is supported and reflects MHDC objectives in the 2020 Destination Zero Plan.
Chapter 5. Community Facilities	Policy PWK9: Community Facilities. MHDC supports this policy, and we consider that the identified community facilities cover important services and facilities within the neighbourhood area. We also support the provision of a new convenience facility within Collett's Green and

	Powick, though any proposal would need to reflect the requirements of SWDP 37 in the adopted plan, and SWDPR 47 in the SWDPR. We also support the enhancement for outdoor recreation and play, and new facilities, such as a youth club. As is explained within paragraph 5.3, the policies referenced in paragraph 5.2 will need to be updated to reflect the new SWDPR, once the Main Modifications Consultation begins.
Chapter 6: Housing	Paragraphs 6.1 to 6.4 should be amended to delete reference to Annex E, as this has been removed from the SWDPR. The housing requirement for the neighbourhood area is now zero with the Main Modification to SWDPR03. This is because the SWDPR is meeting all of its housing requirement through allocated sites. However, it should be noted that this is a minimum requirement. Furthermore, the NPPF explains that neighbourhood plans should be positively prepared, and to fully benefit from paragraph 14 of the NPPF, in addition to the other prerequisite relating to housing delivery policies, the inclusion of a housing allocation within the neighbourhood plan. Although the NP considers that the housing requirement has been met by recent planning permissions it should be noted that this would not meet NPPF para 14 in the event of MHDC not being able demonstrate a 5-year housing land supply at a time post adoption of the SWDPR. Policy PWK10: Housing mix. MHDC supports the aims for this policy, and the focus on ensuring that there is greater provision for housing that reflects the communities' requirements. The policy is supported by community survey results and the 2021 SHMA update prepared for the SWDPR. Policy PWK11: Design of new housing. Policy PWK11 seemingly has two different names, within the list of policies (page 1) it is known as "Design of new housing", and within the policy text, the title is "Housing Development". This needs to be reviewed and adjusted so that the policy has one consistent title throughout the text. This policy is aligned with the SWDP and SWDPR policies relating to design. We also support the inclusion of a focus on incorporating sustainability measures within new housing. Policy PWK12: Householder development. This policy is supportive of the SWDP and SWDPR policies relating to design, and the South Worcestershire Design Guide SPD (2018). Policy PWK13: Land south of Old Malvern Road. MHDC supports the aspirations of this policy in assuring a high quality and sustainably designed development. The policy is aligned with the relevant development management policies in the SWDP and SWDPR. The site remains allocated within the SWDPR, and paragraph 6.18 should make reference to the most up to date version of the SWDPR site allocation, as shown within the Main Modifications version of the SWDPR.
Chapter 7: Economic Development	Policy PWK14: Small-scale employment. This policy is supported and aligns with SWDPR 14 and 15 employment policies, as well as the NPPF, that both seek to support economic development in rural areas. Typos/syntax corrections within this policy are as follows: "2. ... "environmental consequences, including those which may"
Chapter 8: Delivering the Neighbourhood Plan	The contents of this chapter are noted and supported.

Chapter 9: Community Actions	The contents of this chapter are noted and supported.
Plans	Noted
Appendix A: Evidence Base	The evidence base is proportionate to and supportive of the draft policies. The SWDPR Main Modifications document should be used to update references made to the SWDPR.
Appendix B: Windfall Housing Completions	Noted

12.0 Conclusion

- 12.1** Overall, MHDC considers that the Powick Neighbourhood Plan (consultation draft version) aligns with the South Worcestershire Development Plan (2016), as well as the draft policies in the SWDPR, and the NPPF. Although, it is acknowledged that it is for the Independent Examiner to consider whether the Neighbourhood Plan meets the Basic Conditions and to make any recommendations accordingly.
- 12.2** It is understood that it is the intention of the Parish Council to adopt the draft Powick Neighbourhood Plan against the SWDPR, once adopted in spring 2026. Therefore, prior to the Regulation 15 submission stage and Regulation 16 consultation, the draft Neighbourhood Plan should be updated to reflect the final policy text and numbers of the adopted SWDPR, by referring to the SWDPR Main Modifications consultation document.