

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 9th November to 5:00pm on Friday 21st 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, 21st December 2018 to:**

Email: 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 Any other details, including signatures, private telephone numbers and email addresses will not be published on the Council's website, but the original representations with personal details redacted will be published.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: Rebecca Anderson
Organisation (if applicable): Icen Projects
Address (including postcode): Da Vinci House, 44 Saffron Hill, London EC1N 8FH
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 MT2: Town Centre and District Centres Car Parking

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

Policy MT2 “Town Centre and District Centres Car Parking” states that proposals to increase the amount of parking will be supported provided they meet certain criteria, one of which is to ensure that “20% of car parking spaces should have an electric vehicle charging point in an active form”.

We do not oppose to the Council’s strategy to include electrical vehicle charging points (EVCP’s), however it must be ensured that the quantity is evidenced based. The requirement that 20% of car parking spaces should have EVCP’s is contrary to Worcestershire County Council’s (WCC) requirement that initially 5% of the total parking spaces provided should have EVCP’s with a further 5% of the total parking spaces at an agreed trigger (i.e. 10% in total). This is outlined in WWC’s “Streetscape Design Guide” (Page 35) . We request that the standard set out within the NP should be minimised to mirror the standards set out within WCC’s Streetscape Design Guide, and be reduced to 10%.

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 MT3: Malvern Link Rail Station Opportunity Area

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

Policy MT3 “Malvern Link Rail Station Opportunity Area” identifies proposals for a transport interchange including bus facilities and park and ride facilities with car, motorcycle and cycle parking at the Opportunity Area. The Opportunity Area boundary is consistent with land interests of our client. We support the principle of the policy and consider that in order to ensure it is fully deliverable the nature of the policy should be amended as set out below.

Car Parking

Within WCC’s Local Transport Plan (LTP) 2018-2030 , Malvern Link Station Car Park is identified for “potential future expansion” to the north of the existing car park, using land formerly occupied by the rail industry. Paragraph 5.7.10 of the NP states that the vacant land to the north of the railway station has been identified in the LTP, however it does not provide details as to how many spaces should be provided on this land.

This is further highlighted in Paragraph 5.7.14 of the NP which states that the policy does not provide an indication of the total number of parking spaces to be provided but then states that “it is important to achieve as a high number of spaces as possible”. This provides further uncertainty as to how many car parking spaces must be provided as part of the Policy.

In the absence of any quantified evidence of future demand, Grammont Group engaged with West Midlands Trains in Summer 2018, who indicated, based on their forecasts of the use of Malvern Link Rail Station, that car parking capable of accommodating in the region of 90 spaces in total by 2030 is what they will recommend to WCC. This would mean expanding the existing car parks by around 30 spaces. We request that this number be put forward into Policy MT3 based on quantifiable evidence provided by West Midlands Train and replace the wording “as high number of spaces as possible”.

It is also worth noting that the lease for the car park owned by Grammont Group is due to expire in less than three years (April 2021), therefore we consider that there is a growing need for a pragmatic solution that works for all parties to ensure ongoing parking provision at the station. Residential development at the site will ensure that the proposed expansion of car parking provision to the north of Howsell Road is both viable and deliverable in the short term. Grammont Group is also happy for conditions to be imposed on any planning permission at this site, or to enter into a Section 106 Agreement, that ensures the retention of the car park in the long-term.

Sustainable Development

The site is located in a highly sustainable location, located adjacent to Malvern Link Rail Station and located in close proximity to a wide variety of services in Malvern Town. At the heart of the National Planning Policy Framework (NPPF) (2018), is the presumption in favour of sustainable development. Paragraph 38 of the NPPF also states that decision-makers at every level should seek to approve applications for sustainable development where possible. We consider the addition of a residential element on this site and therefore on this policy, could promote sustainable development in the area.

Paragraph 106 of the NPPF highlights that the density of developments should be maximised and optimised in locations that are well served by public transport. We consider that this site has the potential to provide more than just parking, as the site is located in a perfect position for residential dwellings. The NPPF also states that planning policies and decisions should support development that makes efficient use of land. We consider that allocating this site wholly for parking purposes, does not promote the efficient use of land, in a highly sustainable location, such as land at Howsell Road, Malvern.

South Worcestershire’s Development Plan Review (SWDPR), Objective 4 suggests that the SWDP should allocate most development in locations where there is good access to local services and where transport choice is optimised. The site is located in good access to local services in Malvern Town and also provides a variety of transport options in immediate proximity.

In order to ensure that the Town Council’s aspirations for the site can be delivered it is essential that the policy allows for an element of residential development. This will ensure that the expanded parking area can be delivered holistically alongside much needed new homes. This will ensure that this vacant site can be turned to good use and improve the urban fabric of Malvern Town.

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 MT3: Malvern Link Rail Station Opportunity Area- Proposed Change

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

Given the above, we propose the following change (underlined) to the policy:

“Proposals for a transport interchange including bus facilities and park and ride facilities with car, motorcycle and cycle parking, and supporting residential development, at the Opportunity Area identified on the Key Diagram and at Figure 5.7 will be supported provided they meet all the following criteria...”

Also, see our proposed change to Policy MT4 in relation to electric vehicle charging points.

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 ...Rebecca Anderson... **Date** ...18 December 2018

Thank you for completing this form.



Da Vinci House
44 Saffron Hill
London EC1N 8FH



Planning Policy
Malvern Hills District Council
Planning Services
The Council House
Avenue Road
Malvern
Worcestershire
WR14 3AF

18 December 2018

Our Ref: 16/338
BY EMAIL [policy.plans@malvern hills.gov.uk]

Dear Sir/Madam,

MALVERN TOWN NEIGHBOURHOOD PLAN CONSULTATION
LAND AT HOWSELL ROAD, MALVERN LINK, WORCESTERSHIRE

Iceni Projects Ltd has been instructed by Grammont Group to prepare representations to Malvern Town's Neighbourhood Plan (NP) Consultation.

Grammont Group wishes to outline the development potential of land at Howsell Road, Malvern Link ("the site") to provide a residential led scheme with support for additional car parking at Malvern Link Rail Station, which lies within the Malvern Town Neighbourhood Plan Area (NPA). The site is located in a highly sustainable location, is deliverable and can contribute to the housing supply in Malvern Town.

As such, these representations highlight the role our site can play in helping the Town Council meet their objectives and overall vision, in a sustainable way. Furthermore, these representations highlight how the site conforms with the overall vision set out within South Worcestershire's Development Plan (2016).

a. Background

Under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012, Malvern Town Council submitted the Malvern Town Neighbourhood Plan to the District Council on 31 October 2018. In accordance with Regulation 16, Malvern Hills District Council is now required to undertake a public consultation.

The Site

The site subject to these representations is located on Howsell Road, adjacent to Malvern Link train station. The site is considered as previously developed land (pdl) within the urban area of Malvern and consists of two parcels of land. The southern parcel (0.2 ha) is currently used in part as a car park related to Malvern Link Rail Station and provides 30 spaces. Part of this parcel of land (and land to the east) is leased to the existing garage and used for parking associated to this use. The northern parcel (0.7 ha) is vacant, under-utilised land. It has been subject to some trespassing and anti-social behaviour. A site plan is attached.

Within a 10 minute walk of the site is the District Centre of Worcester Road which provides a good range of community services, facilities, retail and access to more public transport. The site is also very close to Link Common, which is a significant greenspace resource for the area.

The site is located within Flood Zone 1, and as such has a low probability of flooding. There are no listed buildings within or adjacent to the site, however the northern parcel of land lies adjacent to the Malvern Link Conservation Area and the southern parcel (existing Malvern Link Rail Station car park) is located within Malvern Trinity Conservation Area.

b. Representations to Policy

The following section highlights the Draft Policies relevant to these representations.

Policy MT2: Town Centre and District Centres Car Parking

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This is further highlighted in Paragraph 5.7.14 of the NP which states that the policy does not provide an indication of the total number of parking spaces to be provided but then states that “it is important to achieve as a high number of spaces as possible”. This provides further uncertainty as to how many car parking spaces must be provided as part of the Policy.

In the absence of any quantified evidence of future demand, Grammont Group engaged with West Midlands Trains in Summer 2018, who indicated, based on their forecasts of the use of Malvern Link Rail Station, that car parking capable of accommodating in the region of 90 spaces in total by 2030 is what they will recommend to WCC. This would mean expanding the existing car parks by around 30

¹ Worcestershire County Council- Streetscape Design Guide (Winter 2018). Available:

http://www.worcestershire.gov.uk/info/20007/travel_and_roads/284/transport_guidance_for_developers/2

² Worcestershire County Council- Local Transport Plan 2018-2030. Available:

http://www.worcestershire.gov.uk/downloads/file/9024/worcestershire_s_local_transport_plan_ltp_2018_-_2030

spaces. We request that this number be put forward into Policy MT3 based on quantifiable evidence provided by West Midlands Train and replace the wording “as high number of spaces as possible”.

It is also worth noting that the lease for the car park owned by Grammont Group is due to expire in less than three years (April 2021), therefore we consider that there is a growing need for a pragmatic solution that works for all parties to ensure ongoing parking provision at the station. Residential development at the site will ensure that the proposed expansion of car parking provision to the north of Howsell Road is both viable and deliverable in the short term. Grammont Group is also happy for conditions to be imposed on any planning permission at this site, or to enter into a Section 106 Agreement, that ensures the retention of the car park in the long-term.

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In order to ensure that the Town Council’s aspirations for the site can be delivered it is essential that the policy allows for an element of residential development. This will ensure that the expanded parking area can be delivered holistically alongside much needed new homes. This will ensure that this vacant site can be turned to good use and improve the urban fabric of Malvern Town.

c. Proposed Change

Given the above, we propose the following change (underlined) to the policy:

“Proposals for a transport interchange including bus facilities and park and ride facilities with car, motorcycle and cycle parking, and supporting residential development, at the Opportunity Area identified on the Key Diagram and at Figure 5.7 will be supported provided they meet all the following criteria...”

Also, see our proposed change to Policy MT4 in relation to electric vehicle charging points.

d. Conclusion

In summary, these representations confirm that land at Howsell Road, Malvern, is available, suitable and achievable as a residential development, alongside car parking for Malvern Link Rail Station. Grammont Group request that the site should be considered as an appropriate residential development in addition to the car parking within the NP, as the site is located in a highly sustainable location on previously developed land and is in accordance with National Policy. Furthermore, the site could provide long-term certainty regarding the car parking provision for Malvern Link Rail Station, and the number of spaces can be supported by evidence provided by West Midlands Trains.

Thank you for the opportunity to respond to the Malvern Town NP consultation. We would be grateful for confirmation of the receipt of these representations and would welcome the opportunity to discuss our site and the contribution it can make to sustainable development of the town

Yours faithfully,



Rebecca Anderson
ASSISTANT PLANNER

Land north and south of Howsell Road, Malvern

