# CONSULTATION STATEMENT MALVERN NEIGHBOURHOOD PLAN 2015 - 2030

On behalf of



	Contents	Page Nos.
1	Introduction	3
2	Neighbourhood Plan Working Party	5
3	Pre-Draft Consultation and Engagement	6
4	Consultation on the Draft Neighbourhood Plan	8
5	Responses to the Draft Neighbourhood Plan	9
6	Further consultation on proposed Neighbourhood Heritage Areas and the V	isual Study 10
7	Amendments to the Neighbourhood Plan	12
8	Conclusion	21

# **Appendices**

- 1.1 The Neighbourhood Planning (General) Regulations 2012 Schedule 1 Consultation Bodies
- 2.1 Malvern NP Working Parties request for support
- 2.2 Malvern NP Strategic Planning Working Party Councillor Comments and Response (June 2017)
- 3.1 Dyson Perrins Church of England Academy public meeting (November 2014)
- 3.2 Neighbourhood Planning Open Day at the Abbey Hotel (April 2015)
- 3.3 Tour of Malvern's Neighbourhoods (June 2015)
- 3.4 Feedback Summary to date
- 3.5 Feedback Summary to Date Comments 26-10-2015
- 3.6 Malvern's Future Questionnaire (September 2015)
- 3.7 Malvern's Future Questionnaire: Summary Note
- 3.8 Neighbourhood Plan Policy Review event at the Lyttelton Rooms (July 2017)
- 4.1 MTC Press Release on Regulation 14 draft plan (November 2017)
- 4.2 Malvern Neighbourhood Plan summary leaflet (November 2017)
- 4.3 Local groups and organisations
- 4.4 Regulation 14 consultation letter
- 4.5 Consultation Draft Comments Form
- 5.1 Malvern Neighbourhood Plan Consultation Draft: Comments Summary and MTC Proposed Response Statutory Consultees and Stakeholders
- 5.2 Malvern Neighbourhood Plan Consultation Draft: Comments Summary and MTC Response

   Local Residents and Stakeholders
- 5.3 MHDC informal comments September 2018 and MTC Response
- 6.1 Neighbourhood Heritage Areas consultation leaflet
- 6.2 Neighbourhood Heritage Areas comments form
- 6.3 Neighbourhood Heritage Areas consultation response
- 6.4 Malvern Gazette article (April 2018)
- 6.5 Top Ten Views Press Release (May 2018)
- 6.6 Visual Study Consultation: Comments Summary and MTC Response

## 1 Introduction

- 1.1 This Statement provides the evidence to demonstrate that the Malvern Neighbourhood Plan (MNP) has been produced with the engagement and participation of the local community and other stakeholders with an interest in the area.
- 1.2 The Statement has been prepared to fulfil the legal obligations of 'The Neighbourhood Planning (General) Regulations 2012' (as amended). Section 15 (2) of Part 5 'Neighbourhood Development Plans' of the Regulations sets out what a Consultation Statement should contain:
  - (a) Contains details of the persons and bodies that were consulted about the proposed neighbourhood development plan;
  - (b) Explains how they were consulted;
  - (c) Summarises the main issues and concerns raised by the persons consulted; and
  - (d) Describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.
- 1.3 Section 14 'Pre-submission consultation and publicity' of the Regulations sets out the minimum requirement for consultation of the draft (or pre-submission) version of a neighbourhood plan. These are:
  - (a) Publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area:
    - (i) Details of the proposals for a neighbourhood development plan;
    - (ii) Details of where and when the proposals for a neighbourhood development plan may be inspected;
    - (iii) Details of how to make representations; and
    - (iv) The date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised.
  - (b) Consult any consultation body referred to in Paragraph 1 of Schedule 1 (see Appendix 1.1) whose interests in the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and
  - (c) Send a copy of the proposals for a neighbourhood development plan to the Local Planning Authority.
- 1.4 A greater level of consultation, engagement and participation by the community has taken place than required by the legislation. This is evidenced within the following sections of this Statement.
- 1.5 The aims of the consultation and engagement process were:
  - To develop the plan using volunteers from the community as well as Town Councillors.

- To carry out initial consultation so that the development of the plan was informed by the views of local people and others from the start of the neighbourhood planning process.
- Engage with as wide a range of people as possible, using a variety of events and consultation techniques.
- Ensure that consultation events were well published and located in accessible locations.
- Ensure that the results of consultation events were fed back to local people as soon as possible after the consultation event.

OCTOBER

## 2 Neighbourhood Plan Working Party

- 2.1 Malvern Town Council (MTC) resolved in May 2014 to progress with producing a Neighbourhood Plan. In the same month MTC established a Neighbourhood Plan Working Party (NPWP). The aim of the NPWP is to deliver a Neighbourhood Plan on behalf of Malvern Town Council that properly reflects the wishes of the electorate and which meets criteria within the Localism Act 2011, Section 9 Neighbourhood Planning and any other relevant and subsequent legislation. The membership of the NPWP consists of ten nominated Councillors from MTC and the Town Clerk.
- 2.2 The Town Clerk has provided updated reports on the progress of the MNP at the Town Council meetings. The NPWP, Town Clerk and Neighbourhood Plan Officer have overseen the instruction and management of consultants that were engaged to help produce the MNP and its supporting documents and engage with stakeholders.
- 2.3 MTC has also been responsible for organising engagement and consultation with the community and stakeholders on the production of the MNP.
- 2.4 MTC set up a number of Working Groups, following requests for volunteers from the local community (see Appendix 2.1), to look at a number of issues within nine key themes including:
  - i. Business and employment
  - ii. Local and Neighbourhood Centres
  - iii. Travel and Transport
  - iv. Visitor Economy
  - v. Design
  - vi. Heritage (non-designated heritage assets)
  - vii. Green Spaces
  - viii. Nature Conservation (local conservation assets)
  - ix. Youth Provision
- 2.5 Information gathered by these groups is included within the Evidence Base Report<sup>1</sup>.
- 2.6 At MTC's Strategic Planning Meeting in April 2017 and the NPWG meeting in May 2017 Councillors were given the opportunity to make substantive comments on a draft of the plan. Appendix 2.2 provides a summary of the comments made by Councillors and the response from the neighbourhood plan consultant and MTC Officers.

<sup>1</sup> http://www.malvernsfuture.org/uploads/docs/vtujl53q\_1289EBRFULLMARCH\_17compressed.pdf

# 3 Pre-Draft Consultation and Engagement

- 3.1 MTC have carried out a number of engagement and consultation exercises with the local community prior to carrying out the statutory consultation on the draft plan (Regulation 14 consultation):
  - November 2014 public meeting at Dyson Perrins Church of England Academy (see Appendix 3.1 for details).
  - April 2015 Neighbourhood Planning Open Day event at the Abbey Hotel (see Appendix 3.2 for details).
  - June 2015 Tour of Malvern's neighbourhoods 'Local Focus Week' (see Appendix 3.3 for details). Appendix 3.4 provides a summary of the feedback from the Open Day and Local Focus Week and Appendix 3.5 provides a summary of the response to these issues.
  - September October 2015 Questionnaire to all households in the NPA (see Appendix 3.6 for a copy of the questionnaire and Appendix 3.7 for details of responses).
  - 18 July 2017 Neighbourhood Plan Policy Review event at the Lyttelton Rooms (see Appendix 3.8 for details which includes comments from 22 no. individuals who responded to consultation at this event).
- 3.2 Meetings also took place within a number of key stakeholders including:
  - Malvern Hills District Council
  - The Malvern Hills Trust
  - The Malvern Civic Society
  - Fortis Living
  - QinetiQ
  - The Malvern Priory
  - Great Malvern Association of Traders
  - Barnards Green Traders Association
- In relation to the latter two a questionnaire was issued to traders within Great Malvern, Barnards Green and Malvern Link Centres. A copy of the questionnaire and the responses is included within the Evidence Base Report<sup>2</sup> at Appendix 2.1 and 2.2.
- 3.4 The Town Council set up the Malvern's Future website (<a href="http://www.malvernsfuture.org/">http://www.malvernsfuture.org/</a>) in March 2015 which is dedicated to the production and publicity of the neighbourhood plan.

<sup>&</sup>lt;sup>2</sup> http://www.malvernsfuture.org/uploads/docs/vtuil53g 1289EBRFULLMARCH\_17compressed.pdf

3.5	The above	shows	that	there	has	been	significant	engagement	and	consultation	with	the	local
	community	in the d	evelo	pment	t of th	ne MNI	P.						

3.6	A Strategic Environmental Assessment and Habitat Regulations Assessment full screening was
	undertaken for the draft MNP. During the process of Scoping the SEA/HRA and consulting on the
	SEA/HRA report the following consultees were contacted; The Environment Agency, Historic
	England and Natural England.

7

# 4 Consultation on the Draft Neighbourhood Plan

- 4.1 Malvern Town Council approved the draft Neighbourhood Plan, Sustainability Report and other supporting documents for the purposes of consultation in October 2017.
- 4.2 The Regulation 14 Consultation took place for 10 weeks from 17 November 2017 to 26 January 2018. Appendix 4.1 provides a copy of MTC's press release and Appendix 4.2 provides a copy of the summary document sent to households in the NPA. Appendix 4.3 provides a list of local groups and organisations that were consulted and Appendix 4.4 provides a copy of the letter e-mailed to national and local organisations.
- 4.3 Digital and uploadable copies of the following were available from the Malvern's Future website (http://www.malvernsfuture.org/) under the 'Neighbourhood Plan documents' page:
  - Malvern Draft Neighbourhood Plan (November 2017)
  - Malvern Draft Neighbourhood Plan Key Diagram (November 2017)
  - Consultation Draft Comments Form (see Appendix 4.4)
  - Sustainability Report (November 2017)
  - Evidence Base Report (July 2016 Updated March 2017)
  - Housing Needs Assessment (February 2016)
  - Heritage Character Assessment (November 2017)
  - Worcestershire Biological Records for Malvern (December 2016)
- 4.4 Letters to the consultation bodies (list provided by Malvern Hills District Council) were emailed on 15 November 2017.
- 4.5 At the time of the Regulation 14 consultation there were a small number of outstanding issues in relation to proposed land use designations within the draft plan. These related to:
  - Key Views and Vistas (Policy MG3)
  - Neighbourhood Nature Conservation Sites (Policy MG5)
  - Neighbourhood Heritage Areas (Policy MHE2)
  - Infill Development Restraint Zones (Policy MH3)
- 4.6 The consultation on the draft Plan expressly requested suggestions on locations for the proposed Areas, Zones and Views and Vistas. Any responses would be assessed after the end of the consultation period. Should any be taken forward there may need to be further discreet consultation on these before the plan is to be submitted to MHDC.

# 5 Responses to the Draft Neighbourhood Plan

- 5.1 Appendix 5.1 provides a detailed schedule summarising the responses made statutory consultees and stakeholders. In total there were some 19 no. respondents providing comments on the draft plan.
- 5.2 The table at Appendix 5.1 provides a schedule of the comments received and the suggested changes where these were proposed. The table also includes the Town Council's proposed response to the comments and its proposed amendments to the neighbourhood plan.
- 5.3 Appendix 5.2 provides a summary of comments made by residents and local stakeholders including MTC's response to these comments. In total there were some 44 no. respondents providing comments on the draft plan.
- 5.4 Following the analysis of the responses changes were made to the draft Neighbourhood Plan. The modified draft MNP was sent to MHDC for their informal comments in July 2018. Appendix 5.3 provides a schedule of MHDC's informal comments and MTC's proposed response to these.

# 6 Further consultation on proposed Neighbourhood Heritage Areas and the Visual Study

6.1 Following an assessment of responses, existing data and resources it was decided to undertake two further studies to help gather the evidence to support the proposed policies on Neighbourhood Heritage Areas and Key Views and Vistas. It was considered that MTC did not have the required resources to undertake studies that would provide robust evidence to support the identification of proposed neighbourhood nature conservation sites and proposed infill restraint zones which had been proposed in the Regulation 14 draft plan. Alongside this and representations made it was decided that these policies would not be progressed through to the Submission version of the plan.

#### **Neighbourhood Heritage Areas**

- 6.2 MTC undertook a 4 week consultation on the proposed NHAs from 6 August to 31 August 2018.

  This included:
  - hand delivering a leaflet (see Appendix 6.1) to each property within the proposed NHA;
  - putting a copy of the NHA Report and comments form (Appendix 6.2) on the Malvern's Future website; and
  - holding an consultation event on 15 August from 5:00-7:00pm at MTC's offices.
- 6.3 MTC also e-mailed key stakeholders about the consultation including:
  - MHDC Planning Policy and Conservation Officers
  - Worcestershire County Council Planning Officers
  - Malvern Hills Trust
  - Malvern Hills AONB Partnership
  - Malvern Civic Society
- 6.4 A total of three individuals attended the consultation event. Four responses was submitted and is included at Appendix 6.3.

#### **Visual Study**

- 6.5 MTC placed an article in the Malvern Gazette on 6 April 2018 asking residents and others to provide information (photographs and a location plan) on their favourite views in Malvern (see Appendix 6.4). A reminder was issued in May 2018 (see Appendix 6.5). A total of 22 responses were received. These were passed on to the consultant undertaking the Visual Study.
- 6.6 MTC undertook a 4 week consultation on the Visual Study from 11 September to 8 October 2018. This included:

- An advert in the Malvern Gazette;
- putting a copy of the Visual Study Report and comments form on the Malvern's Future website; and
- holding an consultation event on 20 September from 5:00-7:00pm at MTC's offices.
- 6.7 MTC also e-mailed key stakeholders about the consultation including:
  - MHDC Planning Policy
  - Worcestershire County Council (Landscape and Planning)
  - Herefordshire Council
  - Malvern Hills Trust
  - Malvern Hills AONB Partnership
  - Malvern Civic Society
  - Adjoining Parish Councils
- 6.8 Around 40 individuals attended the consultation event on 20 September and 17 no. responses were received to the consultation. This included from the following:
  - 12no, Local residents
  - Local stakeholders such as MHAONB Unit, MHT, MCS, Malvern Museum and MHDC; and
  - 2no. Landowners/developers (Hallam Land Management and Barwood Land Management)
- 6.9 A schedule detailing the comments received and MTC's response is included at Appendix 6.6. Changes to the wording of Policy MV1: Key Views and to the Visual Study Report were made as a result of the comments made.

## 7 Amendments to the Neighbourhood Plan

- 7.1 A number of changes have been made to the MNP arising from the comments and responses to the various consultations (both statutory and non-statutory) on the Draft Plan. A further draft of MNP was submitted to MHDC in July 2018 and informal comments were received in September 2018 (see Appendix 5.3). A further draft of the MNP was also submitted for a 'Health Check' at the beginning of September 2018. Further changes were made as a result of the suggested recommendations arising from these processes.
- 7.2 Some of these changes relate to the format and presentation of the document. Others relate to more substantive issues including the number and wording of policies. The paragraphs below provide a summary of the changes between the Draft MNP and the Submission MNP.

#### **Section 1: Introduction**

7.3 Reference in a footnote to the start of the review of the SWDP in relation to the strategic policies for the area. Minor amendments at paragraph 1.5 in that the bullet points include some but not all the basic conditions; updating the position in relation to progress with 'Developing the MNP' to include the undertaking the Regulation 14 consultation; the production of a Consultation Statement and Basic Conditions Statement; updating the list of evidence base documents at paragraph 1.21 and the updating the 'next steps' at paragraph 1.22 with anticipated dates for each of the next stages.

#### **Section 2: The Planning Policy Context**

7.4 Removal of reference to Appendix 2.1 and 2. 2 in relation to a list of strategic and generic policies within the SWDP, addition of summary details of strategic policies and footnote updated to refer to 2018 NPPF and the transitional arrangements.

#### Section 3: The Malvern Neighbourhood Area: Issues and Considerations

7.5 This has been removed from the MNP document. It is now included within its own stand-alone document with the same title. Amendments to the text were made as a consequence of comments made in various representations.

#### Section 4: Vision and Objectives

7.6 Now Section 3. Minor change to objective 2 with addition that new development should protect and enrich 'visual amenity, key views and vistas' as well as the natural environment and landscape character. Objectives are emphasised in bold and additional paragraph referring to the fact that the objectives are carried through the plan into policies and local projects and initiatives.

#### Section 5: Strategy

7.7 Now Section 4. There were no objections received to its content. This section is broadly the same as the Draft MNP with a minor change to paragraph 4.2 to highlight that a key element of the strategy is to promote and achieve sustainable development in the plan area up to 2030. It is considered a relevant section in providing the context for the policies and provides a high level

direction for where and how the MNP will take the NPA over the next ten years. Reference to Figure 5.1 is removed and replaced with reference to the Key Diagram being a separate document.

#### Section 6: Policies and Proposals

7.8 Now Section 5. The table overleaf provides a summary of the changes to each of the draft MNP policies.

#### Section 7: Plan Delivery and Implementation

7.9 Now Section 6. This section sees limited changes which reflect the changes to the policies. This section includes details of projects and initiatives which the community and MTC consider would help make Malvern a more sustainable place to live, work and visit. These are included within a sub-section entitled 'Community Aspirations'. Some of these projects and initiatives could be assisted by policies within the MNP.

#### Section 8: Plan Monitor and Review

7.10 Now section 7. This section now refers to revised NPPF and the need to review the policies within the MNP against this NPPF (at present the policies have been assessed against the 2012 NPPF. The section also refers to the SWDP Review and provides a stronger commitment for a review of the plan within a specified period following the making of the MNP.

#### **Appendices**

- 7.11 Appendices 2.1-2.3 have been deleted and reference in Section 2 of the MNP is made on strategic policies. Appendix 2.4 now becomes 2.1.
- 7.12 Appendices 3.1-3.3 have been removed as they are now included within the separate document 'The Malvern Neighbourhood Area: Issues and Considerations'.
- 7.13 A list of Hills and Commons Land is added at Appendix 5.1.
- 7.14 Amendment to Appendix 5.2 (previously Appendix 6.1) 'Local Green Space Sites' including a table demonstrating how each site meets the LGS criteria within the NPPF and references the Local Green Space Evidence Report. OS plans for each LGS is also included within this appendix.
- 7.15 Amendments to Appendix 5.3 (previously Appendix 6.2) 'Neighbourhood Open Spaces' adding reference number and typology of open space and removing the ward location for each site.
- 7.16 Appendix 6.3 'Neighbourhood Nature Conservation Sites' is deleted.
- 7.17 Appendix 6.4 'Non-designated Heritage Assets proposed for Local Listing' amended to remove buildings previously listed that are located within Conservations Areas (comment made by Historic England) and remaining list now included within Section 5.
- 7.18 Appendix 5.4 provides OS plans of each of the proposed 5no. Neighbourhood Heritage Areas.
- 7.19 Appendix 5.5 (previously 6.4) 'Community Facilities' added as referred to in policy MC1: Community Infrastructure.

- 7.20 Appendix 5.6 'Local Character Areas: positive aspects of character and character management principles' added as referred to in the reasoned justification to Policy MD1: Design and Accessibility Principles. The information is taken from the Heritage Character Assessment (November 2017).
- 7.21 Appendix 5.7 (previously Appendix 6.6) 'Town and District Centre Car Parks' know includes OS plans of car parks within each of the Centres and is referred to in Policy MT2: Town Centre and District Centre Car parking.
- 7.22 Appendix 6.7 'List of Local Projects and Initiatives' is removed and is now included within Section 6 under sub-heading 'Community Aspirations'.
- 7.23 Appendix 5.8 provides OS plans for each of the proposed Neighbourhood Parades.

#### **Key Diagram**

- 7.24 The Key Diagram has been amended to reflect representations made and changes to proposed designations including:
  - The addition of the proposed Neighbourhood Heritage Areas;
  - The addition of the Town Centre and District Centre car parks;
  - The removal of the Great Malvern Railway Station Opportunity Area;
  - Amendments to the proposed Neighbourhood Open Space sites; and
  - The inclusion of A4 size plans of proposed Local Green Space sites, Neighbourhood Heritage Areas, Town & District Centre Car Parks and Neighbourhood Parades.

4
0
N
$\alpha$
111
<b>=</b>
ш
$\circ$
$\simeq$
$\circ$
Ō

Draft MNP Policy	Submission Version	Change	Reason
N/A	MSD1: Promoting and achieving sustainable development	Addition of an overarching policy which seeks to promote and achieve sustainable development within the NPA.	Responds to a suggestion from the Health Check. Greater clarity on meeting 'achieving sustainable development' basic condition.
MG1: Local Green Space	MG1: Local Green Space	Inclusion of a list of the proposed LGS sites and removal of part B of the policy. Reference to Appendix 5.1 providing a list of sites owned and managed by MHT and 5.2 which highlights which NPPF criteria each LGS site meets.	To respond to comments from MHDC and other representors. Provides clarity to the decision-taker and ensures general conformity with NPPF and SWDP.
MG2: Neighbourhood Open Space	MG2: Neighbourhood Open Space	Clarity regarding criteria 3 of policy and addition of criteria B to deal with the provision of new NOS.	Responds to comments from MHDC and ensures consistency with NPPF and SWDP.
MG3: Key Views and Vistas	MV1: Key Views	Moved from Green Infrastructure Section into a new section 'Visual Amenity'. Changes to text of policy follow suggestion within the Visual Study Report.	To respond to comments from Health Check, MHDC and other representors. Provides clarity to the decision-taker and ensures general conformity with NPPF and SWDP.
MG4: Woodland, Trees and Hedgerows	MG3: Woodland, Trees and Hedgerows	No change.	No change.
MG5: Neighbourhood Nature Conservation Sites	Deleted	Removed.	To respond to comments from MHDC and other representors.
MHE1: Non-Designated Heritage Assets	MHE1: Non-Designated Heritage Assets	No change.	No change.
MHE2: Neighbourhood Heritage Areas	MHE2: Neighbourhood Heritage Areas	Policy wording includes a list of the 5no. proposed NHAs. The Reasoned Justification refers to the NHA Report and the proposed Areas.	To reflect the evidence collected through the NHA study.

w
₩
0
2
~
ш.
ш
$\mathbf{\omega}$
0
Ĕ.
O
$\sim$

Draft MNP Policy	Submission Version	Change	Reason
MC1: Community Infrastructure	MC1: Community Infrastructure	Additional criteria added to Part A to clarify that this part of the policy deals with new community facilities or the redevelopment of existing facilities for continued community use.	Responds to comments from MHDC and ensure general conformity with NPPF and SWDP.
MC2: Healthy Communities	MC2: Healthy Communities	Policy now refers to major development and incorporates requirements within the adopted Planning for Health SPD (September 2017) which will give this requirement greater weight in the decisionmaking process.	Ensures greater clarity for the decision-taker and general conformity with NPPF and SWDP.
MD1: Development and Design Principles	MD1: Building Design and Accessibility	Incorporates wording from previous policies MD2 within policy and MD3 in the Reasoned Justification. Some criteria from this policy moved to new polices MD2 and MD3. Moves requirements for Design & Access Statement into the RJ. Additional criteria for detailed elements and	Responds to comments from Health Check, MHDC and other representors. Provides clarity to the decision-taker and ensures general conformity with NPPF and SWDP.
MD2: Development and Accessibility Principles	N/A	The policy wording is subsumed into Policy MD1.	Responds to comments from MHDC and other representors. Provides clarity to the decision-taker and ensures general conformity with NPPF and SWDP.
MD3: Detailed Design Elements	N/A	The policy wording is subsumed into Policy MD1 and detailed in the Reasoned Justification to that Policy.	Responds to comments from MHDC and other representors. Provides clarity to the decision-taker and ensures general conformity with NPPF and SWDP.
N/A	MD2: Public Realm and Landscaping	Incorporates wording from previous policy MD1 and criteria includes reference to the AONB and key views.	Responds to comments from Health Check. Provides clarity to the decisiontaker and ensures general conformity with NPPF and SWDP.
Draft MNP Policy	Submission Version	Change	Reason
MNP/CONSULTATION STATEMENT			SUBMISSION

ω
$\overline{}$
0
N
Ľ.
Ш
m
$\overline{a}$
$\sim$
O
Ō
$\overline{}$

V/V	MD3: promoting Sustainable Design	Incorporates wording from previous policy MD1 on SUDs and renewable energy and energy efficiency.	Responds to comments from Health Check. Provides clarity to the decision- taker and ensures general conformity with NPPF and SWDP.
MD4: Microgeneration	MD4: Microgeneration	Additional criteria referring to impact on the Malvern Hills AONB and the character of the local area.	Responds to comments from MHAONB Partnership.
MT1: Transport and Development	MT1: Transport and Development	No major change.	No change.
MT2: Car parking	MT2: Town Centre and District Centre Car Parking	The word 'not' is removed from Part A; motorcyclists added to criteria 4 in Part B and reference made to the need for larger parking spaces. OS plans for each area added.	Responds to comments from Health Check, MHDC and other representors. Provides clarity to the decision-taker and ensures general conformity with NPPF and SWDP.
MT3: Sustainable Travel Routes	Deleted	The principles and objectives of this policy have been incorporated within a proposed initiative within Annex A: Community Aspirations document.	Responds to comments from MHT and MHDC.
MT4: Great Malvern and Malvern Link Railway Stations Opportunity Areas	MT3: Malvern Link Railway Station Opportunity Area	The land at Great Malvern Railway Station is privately owned and it is understood the owner has aspirations to convert the railway carriage into a home. RJ expanded upon.	The opportunity is not considered to be deliverable. Responds to comments from Health Check.
N/A	MT4: Electric Vehicle Charging Points	New policy.	Responds to representations made and policies, guidance and consultations from central government.
MI1: Infrastructure and Development	MI1: Development and Infrastructure	Major amendment with new policy wording.	Responds to comments from Health Check, MHDC and ensures consistency with NPPF and SWDP.
MI2: High Quality Communications Infrastructure	MI2: High Quality Communications Infrastructure	No change.	No change.
MAND/CONSTITUTION STATEMENT			SUBMISSION

SUBMISSION

MNP/CONSULTATION STATEMENT VERSION MALVERN TOWN COUNCIL

SUBMISSION	OCTOBER 2018
------------	--------------

Draft MNP Policy	Submission Version	Change	Reason
ME1: Protecting Employment Allocations	ME1: Protecting Employment Allocations	Removing reference to phasing with residential development. Policy split to deal with support for B1, B2 and B8 development and criteria for assessing other types of development. Clarity that sites are SWDP allocations	Responds to comments from Health Check, MHDC and other representors. Provides clarity to the decision-taker and ensures general conformity with NPPF and SWDP.
ME2: Provision of Small Scale Employment Development	ME2: Provision of Micro and Small Scale Business Development	Inclusion of micro and small businesses which have agreed definitions. Additional criteria included which relate to requirements in Policy SWDP 12. Clarity that criteria 6 relates to proposals in the open countryside.	Responds to comments from Health Check, MHDC and other representors. Provides clarity to the decision-taker and ensures general conformity with NPPF and SWDP.
ME3: Existing Industrial Estates	Policy ME3: Employment development within Existing Industrial Estates and Business Parks	Previous policy now split so new ME3 deals with B1, B2 and B development on employment designated land. Business Parks included in title so that all key employment land within the NPA is referred to. Reference to sequential test as policy refers to B1 development	Responds to comments from Health Check, MHDC and other representors. Provides clarity to the decision-taker and ensures general conformity with NPPF and SWDP.
N/A	Policy ME4: Non-employment development within Existing Industrial Estates and Business Parks	Previous policy now split so new ME4 deals with non-B1, B2 and B development on employment designated land. Business Parks included in title so that all key employment land within the NPA is referred to. Reference to sequential test as policy refers to B1 development	Responds to comments from Health Check, MHDC and other representors. Provides clarity to the decision-taker and ensures general conformity with NPPF and SWDP.
MR1: Town and District Centres	MR1: Town and District Centres	Policy requirement amended from 'must' to 'considered favourably'. Additional criteria added. Reference to mixed use development.	Responds to comments from Health Check, MHDC and ensures consistency with NPPF and SWDP.

SUBMISSION

Draft MNP Policy	Submission Version	Change	Reason
MR2: Neighbourhood Parades	MR2: Neighbourhood Parades	Additional criteria related to alternative facility within walking distance to comply with Policy SWDP10I.	Ensure consistency with SWDP.
MH1: Housing Mix	MH1: Housing Mix	Reference to local housing needs type as identified in the HNA within policy. Inclusion of viability considerations regarding proposed mix of housing within RJ.	Responds to comments from Health Check, MHDC and other respondents and ensures consistency with NPPF and SWDP.
MH2: New Residential Development	MH2: New Residential Development within the Development Boundary	Clarify that policy refers to new housing development within the existing settlement. Criteria amended to include reference to other relevant policies within statutory development plans.	Responds to comments from Health Check, MHDC and ensures consistency with NPPF and SWDP.
MH3: Infill Development Restraint	Deleted	Insufficient evidence to provide proposed zones and considered too inflexible.	Responds to comments from MHDC and other respondents and ensures consistency with NPPF and SWDP.
N/A	MH3: New Residential Development beyond the Development Boundary	Provides a distinction between policy requirements for housing within and outwith the development boundary. Reference to former agricultural buildings for residential use and more clarity on other criteria	Responds to comments from Health Check, MHDC and ensures consistency with NPPF and SWDP.

## 8 Conclusion

- 8.1 The Statement demonstrates how local residents, interested bodies and statutory consultees were consulted on the MNP. It also provides a summary of the responses made to the consultation and what action and response MTC has made in relation to those comments.
- 8.2 The Statement also provides a summary of the changes that have been made to the draft MNP as a result of the consultation responses. As such, the Statement fulfils the requirements of the relevant sections of the Neighbourhood Planning (General) Regulations 2012.