

**MALVERN NEIGHBOURHOOD PLAN CONSULTATION DRAFT: COMMENTS SUMMARY
AND MTC PROPOSED RESPONSE – STATUTORY CONSULTEES AND STAKEHOLDERS**

MALVERN NP REGULATION 14 LOCAL RESIDENT AND STAKEHOLDER COMMENTS AND MTC RESPONSE

GREEN INFRASTRUCTURE / HERITAGE / COMMUNITY FACILITIES

ID Number	Green Infrastructure – Yes – 73.91% 34 No – 26.09% 12	MTC Comments	Heritage – Yes – 71.74% 33 No – 28.26% 13	MTC Comments	Community Facilities Yes – 69.5% 32 No – 30.43% 14	MTC Comments
67995897			I agree in principle but necessarily to conserving every "old" building - e.g. I feel the controversy over the redevelopment of the old Malvern Hospital is unnecessary and should just go ahead	The objective is to seek to protect those buildings and structures which are considered through an objective analysis (applying for designation on the Local List) to be of local architectural and/or historical interest.	As I live in a bungalow backing on to Victoria Park in Malvern Link I experience problems with stray footballs and youths trying to access my garden and this makes me feel very vulnerable. I am worried about the proposed new basketball area as it will be directly in front of my garden - I'm unable to sit out in the summer as it is due to the danger of flying footballs, etc. Please take this into consideration when planning this area.	This is a management issue rather than a land use planning issue. MTC need to pick this up with the respondent and see how they can address their concerns.
68309734	St Wulstans Nature reserve and all common land should also be protected from any new building. Otherwise agree with the proposals	This Nature Reserve is outwith the Neighbourhood Plan Area and therefore the MNP has no jurisdiction over it. The common land within the NPA is identified on the Key Diagram.	Healthy communities should also include capacity within the local school. Demolition of deteriorating buildings marketed for 12 months or more should be fast tracked through planning to stop the building becoming an eyesore and no longer warranting a heritage status. I.e. the old hospital.	School capacity was addressed within the SWDP and its associated Infrastructure Delivery Plan. The old hospital is located within a Conservation Area and national policy (NPPF) applies to the demolition of buildings with CAS.	No more retirement complexes or nursing homes should be built, we have sufficient and these are struggling to find staff. Schools and facilities for young people and families to establish a more mixed community, which research shows is better for all ages, should be a priority.	The Housing Needs Assessment (HNA) shows a need for specialist housing for the elderly. Issue of a lack of staff is not a land use planning matter. The MNP has a policy relating to providing a mix of housing to meet need. The need has been identified through the HNA.

68569633	It should not just be protected, it should be increased. As the town grows it needs more green infrastructure, not just the same amount.	The SWDP includes policies to provide GI and green space as part of new developments.	This is likely to restrict creative use of existing buildings at a time when the town needs revitalising.	There is plenty of evidence to show that heritage assets can help the regeneration of areas.		
68911609	As a part of this, there needs to be more in the plan about refuse disposal and recycling in Malvern and its green spaces	The MNP includes a policy requiring these elements within new developments. Refuse disposal and recycling facilities within Malvern's greenspaces is a management issue that needs to be addressed by the owners of these spaces.	It needs to be more robust in its strategies for protection.	The NPPF and SWDP already includes policies that seek to protect designated and non-designated heritage assets. Any policy within the MNP relating to non-designated heritage assets needs to conform with NPPF and SWDP.	Needs to be more creative and robust.	It's not clear from this response how they consider the policies could be more creative and robust.
68988637	When looking back at Malvern in historic photos there were far fewer trees. Maintaining the Vista does require a balanced approach to management of trees.	It's difficult to know whether there were fewer trees. It may be that as there were less mature, they would have been lower and therefore not as visible. There are significant benefits to having trees and a key issue is that many trees are towards the end of their lives and will need replacing if this element of Malvern's character is to be retained.	In Great Malvern anything that sympathetically removes the blight of poorly located and designed 1960/70's building should be encouraged.	The MNP cannot seek to remove existing buildings. However, the policies within it seek to ensure new buildings respond to and reinforce the positive characteristics of the town.	Malvern also has to acknowledge the wider trends in society e.g. the impact of amazon etc. Change of use, provided it enhances and improves the character of the area should be encouraged and not subject to a 12-month wait.	The town and district centres policy within the MNP recognizes this trend and allows social, cultural and leisure uses as well as retail. Neighbourhood shops can play a vital role for local people. It is considered important to have this criterion in the neighbourhood parades policy to try and retain these local facilities.
70556091	This is a very positive document	Noted.	Heritage museums fossils the Area in the past and are not forward thinking. The commons are heritage and any greenways that are classed as black or brown across the common sell the heritage short.	There is an existing heritage museum which helps to celebrate the town's past. The commons are protected through the Malvern Hills Acts. There is an aspiration to utilize some of the commons for	Town Focal Area good along with one way down church St	These are aspirations that MTC working with stakeholders and the local community will seek to bring forward. The MNP does not include policies relating to these aspirations.

			cycling and walking with formal routes which is identified as one of a range of projects. This shouldn't have an impact on the heritage of the commons.			
70557604	I think it is important to keep an open feel to Malvern. Infill should focus on brown field sites	The MNP includes policies to protect existing greenspaces and has an infill development restraint policy to be applied to certain areas in order to protect their character.	consider adding one of the old buildings on the QinetiQ site for local list	MTC to make enquiries with this respondent as to which building and make application to MHDC for nomination on Local List if it is considered to meet the relevant criteria.		
70560120 70608062	no comment		The best way to preserve Malvern's heritage would be: a, make car parks free b, make church street pedestrians only	Free car parking is a management issue and up to the owners. It is not a land use planning issue. One of the projects listed in Appendix 6.7 is looking at the town and district centres future car parking strategy with MHDC. Pedestrianisation and provision of a town square in Great Malvern is also one of the projects identified in Appendix 6.7.		
70608084					<ol style="list-style-type: none"> 1. Re-open Police Stations 2. Stop banks and Post Offices closing 3. Open GP surgeries 7am-10pm 7 days a week 4. More leisure - cheap - facilities for young people 5. Use the hospital more 6. Clean the Drains 7. More bins needed See Detailed sheet	<ol style="list-style-type: none"> 1. Not a land use planning issue. 2. Policy MC1 seeks to retain subject to criteria important community facilities. 3. Not a land use planning issue. 4. The cost of facilities is not a land use planning matter. The MNP supports the provision of

							leisure facilities within the town and district centres. 5-7. Not land use planning issues.
70611368				Museum needs a bigger space and needs to be more of a tourist attraction	Appendix 6.7 identifies as a project and initiative an aspiration for a science and technology museum. The issue here as well as with the existing heritage museum is finding a suitable space. Noted.		
70922915				Support your local museum ran by volunteers	Local woodland burial would be great. Crematoriums are not carbon neutral, More for youth important		Noted. Is this something that MTC can look at and is there an appropriate site within the NPA?
70930617				The old hospital site should be developed	This is a contentious issue with it is understood a majority view to retain and reuse the building. Noted. This would appear to be the majority view.		Not a land use planning issue.
71476615	Would like to see greater commitment to removing litter, especially from woodland areas, would also like to see more trees planted.	Litter removal is not a land use planning issue. Policy MG4 of the MNP seeks to protect existing trees and ensure additional planting associated with new development. Noted.		Keep the Old hospital because of its local character and historic interest			
71535482	Pleased to see important green Areas identified and protected						Noted.
71534594				This should include the hospital in Lansdowne Crescent	Noted.	Support of existing and new facilities are vital to the community	
71535482				Malvern has a significant history promoting it will help pride in the town and tourism	Noted. The MNP seeks to protect local non-designated heritage assets. MTC to discuss with the Route to the Hills Officer		
73021007				Please review positioning of Route to the Hills			

			<p>tourist lozenges. The Bandstand one in Priors Park is intrusive in its current location, ironically actually blocking view of bandstand at music events.</p> <p>Most buildings Unique Heritage Support AONB and extend it keep Malvern unique</p>	<p>and respond back to respondent.</p>	<p>Ensure best use of current facilities support Theatre Complex appropriate Sports Facilities.</p>	<p>The MNP seeks to do this. The best use of existing facilities is to some extent up to the owner/manager of the facility.</p>
73121550				<p>The MNP seeks to do this. Buildings and structures have been nominated for local listing.</p>		

MALVERN NP REGULATION 14 LOCAL RESIDENT AND STAKEHOLDER COMMENTS AND MTC RESPONSE
DESIGN / TRANSPORT / INFRASTRUCTURE

ID Number	Design	MTC Comments	Transport Yes – 58.7% 27 No – 41.3% 19	MTC Comments	Infrastructure	MTC Comments
68309734	Ensure all buildings, housing and employment facilities, have adequate off road parking, to reduce roadside/pavement parking. Otherwise agree with policy.	Policy MD 2 seeks to do this.	Improve public transport to all areas. Increase car parking provision in the town centre (should be cheap) for town centre workers. Otherwise agree with policy.	The MNP along with other plans can seek to ensure that new development is accessible to public transport. However, it is up to the operators whether they wish to provide services in any particular area. Policy MT2 seeks to protect and where possible increase parking in the town and district centres. The cost of parking is not a land use planning issue.	Improve cycle ways and pavements, but keeping these uses separate. This is particularly needed around schools and employment areas. Otherwise agree with policy.	Appendix 6.7 includes a list of projects that MTC working with the local community wish to see implemented within the area. The provision of off-road routes for cyclists and pedestrians is one such project.
68569633			With the exception of the worrying project example of a bypass for Malvern. This idea overlooks the overwhelming evidence that building more roads just creates more traffic – with all the well established negative impacts this brings.	Noted. Many of those listed in Appendix 6.7 are feasibility studies. Issues around traffic generation associated with a by-pass would be one of a range of factors that would be looked at.		
68911609			Needs to be stronger on making better routes for cycles; encouraging electric vehicles and reducing speed limits in all towns to 20mph with gateways to each town. There needs to be more 'shared streets'.	Appendix 6.7 includes a project looking at the provision of off-road routes for cyclists and pedestrians. Encouraging electric vehicles and reducing traffic speeds are not land use planning issues. The provision of electric charging points associated		

68988637	Please add the consideration to car parking. Some streets are too cluttered.	Policy MT2 seeks to protect and where possible increase parking in the town and district centres. Policy MD 2 seeks to ensure sufficient of-street car parking associated with new developments.				
69936905		Agree but also locate park and ride commuting facility at a reopened Malvern Wells station. Improve link to Gloucester and Bristol along reopened railway to Ash church. Build bypass around Powick.	The former Malvern Wells station is located outwith the Neighbourhood Plan Area and therefore beyond the jurisdiction of the MNP. A reopened link to a location beyond the NPA is outwith the jurisdiction of the MNP. Looking at the feasibility of a bypass is included within Appendix 6.7.			
70558148	I have no idea what this means	Not sure what this is referring to.			I do not support additional development at a scale that will prejudice current infrastructure	Noted. Policy MI1 seeks to ensure that infrastructure is provided to meet the needs arising from new development.
70607570		Well done would fully endorse a mini shuttle bus idea for walkers to ferry from one end of hills back to cars. Also improved and more cycle paths and bike parking in the centre of town.	Noted.			
70608062		I am delighted to see that the NP includes provision for a car park at Great Malvern Station, as parking	Noted. Appendix 6.7 includes a review of MHDC's car parking strategy which could			

			on the streets causes a real problem for residents, buses, refuse lorries. I would urge that a review of street parking be done and my preference would be single yellow lines which I suggested back in 2012 to WCC. In addition I think that Malvern should use Buford as is model in regards to car parking.	include this point. MTC should investigate Burford.		
70608084	1. Make things fit not like prospect view monstrosity 2. Stop all the roadworks and unnecessary tarmacking	1. Policy MD1 seeks to ensure that new development responds to and reinforces the existing character within its area. 2. Not a land use planning issue.	Don't make one way down church street it will cause chaos More local bus routes are needed Make car parks free	Appendix 6.7 includes investigating the pedestrianisation of Great Malvern. Some people are in favour of making changes to Church Street to improve pedestrian movements and create a better environment within the town centre. More local bus routes are up to the operators and is not a land use planning issue. Free car parking is not a land use planning issue.	Get on with building new houses, Affordable under £80,000	The MNP supports the SWDP strategy of delivering housing provision within the NPA and it does not include policies that seek to diminish housing delivery. Affordability is a matter for objective analysis as part of a Housing Needs Survey.
70611368	It integrated with the character of Malvern	This is what policy MD1 seeks to do.	Need some off road routes for cyclists	This is an aspiration within Appendix 6.7 'Sustainable Travel Routes'.		
70922915	Don't want mock Tudor, mock Victorian - how about 21st Century design	Policy MD1 does not preclude 21 st Century design.	Bus network is good	Noted.	Has anyone investigated having a northern ring round Worcester	Appendix 6.7 includes an aspiration to look at the feasibility of a ring road around Malvern.
70930617	It would be nice to see some ultra-modern design. plastering the town with identical persimmon sites is not good enough	Policy MD1 seeks ensure that the design of new development responds to and reflects the local character and integrates positive attributes within the area into its design. The	The QinetiQ development exists onto longridge road. This is not adequate	There are also access points on to St. Andrew's Road and Geraldine Road and potentially Thirstane Road.	At some point north end lane and its continuation should be dueled to prevent tailbacks to the retail park	Townsend Way and North End Lane are single carriageways. Investigate issue with WCC Highways.

71476615	Don't approve developments like the extension on Somers road "Lego"	policy does not preclude 'ultra-modern' design. Policy MD1 seeks to avoid this.	Not sure that a park n ride is really needed or where it would be sited	It would be located on land to the north of the railway station. It seeks to remove the problem of on-street parking and create additional capacity so more people can use train services for commuting and other journeys.		
71534594	Shame these principals haven't been employed in the past	Noted.				
71535482	Essential to maintain and improve the character of our town	This is what policy MD1 seeks to achieve.	The increasing population of Malvern needs careful transport planning if congestion is to be avoided	Agreed. Transport Planning is the responsibility of WCC and is encompassed within the Local Transport Plan.	6.6.2 - 6.6.3-6 in the NP says it all	Noted. The NP seeks to ensure the appropriate provision of infrastructure associated with new development.
71865684 72014839			I write to disagree with your Transport policy, namely MT4 - Great Malvern and Malvern Link Stations Opportunity areas. I have lived in the 'middle' third of Somers Road, between Osbourne & Albert Park Road for nearly 30yrs and the amount of inconsiderate and sometimes dangerous parking by people using the Link station has increased dramatically over the years and I believe that this plan will have an adverse effect on the local residents, and not just those of Somers Road.	The proposal for a park and ride site on land to the north of the station is in part a response to the issues raised in this comment. The parking provision on the site along with traffic regulation orders to restrict on street parking within the vicinity of the station would help to alleviate the problems highlighted by this respondent. This is an issue that MTC would raise with WCC, Network Rail and others should a scheme progress.		
	The majority of those			There is not much the neighbourhood plan can do about land owners charging		

parking from Monday to Friday are going to the Link train station to catch a train, we have had damage done to cars and property, increased litter, parking on the pavement, blocking of driveways etc. We have had cars forming a 'chicane' and parking too close to the car on the opposite side of the road thus preventing large vehicles i.e. fire engines/ambulances/ local council vehicles etc. from getting through, I personally have had to move my car more than once to rectify the problem.				We have a lot of retired and elderly residents and not being able to park, receive visitors or deliveries outside your own home is not acceptable. We also have people leaving their cars for days while going off for a holiday or short weekend break, happily trundling their luggage with no thought for those unable to park outside their own homes.				The possible provision of a (larger?) car park (there is already one at the Link) or a park and ride will only encourage more people to park in Somers Road or any road nearby - the majority																																																																																																																																																																																																																																											
for parking. However, TROs restricting on street parking would providing it was properly enforced go some way to reducing the problems identified by this respondent.																																																																																																																																																																																																																																																			

72219763	Housing design- along with	These issues are addressed	<p>of people won't pay for parking or they prefer to park in a residential area where they 'feel' that their car will be safe.</p> <p>The only way an idea like this can work is to provide parking bays/ permits for the residents of the lower two parts of Somers Road (Howsell Road to Albert Park Road) thus encouraging the use of the car park/ park and ride for those using the station etc.</p> <p>If this plan is implemented it will have a serious and unacceptable impact on the amenity of the residents, their visitors and the neighbourhood as a whole.</p> <p>As an additional note we have visitors to the hospital on the Worcester Road prepared to pay at the hospital car park. We also have visitors and occasional staff from the Osbourne Court Health facility using our road as an alternative parking space. And as I write this objection, I note that someone has just parked on the double yellow lines outside my house and walked off in the directions of the station!</p>	Appendix 6.7 includes a		
----------	----------------------------	----------------------------	--	-------------------------	--	--

	<p>mix of housing types including low cost housing for elderly energy efficient must be an important factor</p>	<p>by policy MD1 and MH1 which looks at design and mix. Energy efficiency is addressed through Building Regulations.</p>	<p>more than land out in plan to be joined up</p>	<p>project to look at the provision of off-road cycle and footpaths within the NPA.</p>	
73021007			<p>Please do not make Church Street one way, downhill as it makes no sense. Ideally, leave as is, since it rarely causes problems. Alternatively it could go uphill one way and downhill traffic would use Edith walk.</p>		
73021017			<p>We need a bus service for the Hall Green area</p>	<p>This is up to the bus operators to provide. MTC can ask the question.</p>	
73020972			<p>Re proposed one way systems in church street at this moment the bus service is very good I rely on it a lot I hope the buses can continue down the hill otherwise it will make it very difficult for me; I cannot walk far to a bus stop.</p>	<p>Appendix 6.7 includes a feasibility study to look at pedestrianisation in Great Malvern. If this study is to go ahead a number of options would be looked at and consulted on.</p>	
73121550	<p>Should mention conservation Areas avoid Bolt on housing estates like North Site</p>	<p>There is already significant guidance for development within the Conservation Areas produced by MHDC. It was felt that MTC did not have any additional information beyond the Appraisal and Management Strategy documents for each of the three Areas. Policy MD1 seeks to ensure that new development of whatever size and scale integrates into the existing area.</p>	<p>Ensure thru train service is London maintained. Welcome car drivers and provide adequate parking. Extend dial a ride schemes.</p>	<p>Policy MT2 seeks to provide additional car parking within the town and district centres. Appendix 6.7 includes a project that looks at the car parking strategy within Malvern. Train services and dial a ride scheme are not land use planning issues.</p>	<p>Appendix 6.7 includes a project to look at the feasibility of a ring road.</p>
73121577			<p>Why were the bus stops</p>	<p>Applaud the extension of the southern link road, support next stage northern link road, extend Townsend way around Barnards Green to 3 counties show ground</p>	
				<p>MTC to obtain response</p>	

			<p>moved out of reach of elderly and crippled pensioners to cut down the use of free transport passes???. It worked</p>	<p>from bus operators.</p>	
73121591		<p>Concern for the amount of traffic going through Malvern Link</p>		<p>Appendix 6.7 includes a project looking at public realm improvements within Malvern Link.</p>	
73541088	<p>Each of the 3 Conservation Areas, with particular regard to Statutory Listed Buildings (Grades I II# II), those properties identified by MTC and MCS for inclusion on MHDCs Local List. Special attention needs to be paid to buildings at risk in these areas, especially the convent of the Holy name, Holly rood house, The Old community Hospital and Malvern....</p>	<p>This relates to an answer to locations for Neighbourhood Heritage Areas. The 3 Conservation Areas are already statutorily designated for their heritage and architectural interest as are many of the buildings listed.</p>			

MALVERN NP REGULATION 14 LOCAL RESIDENT AND STAKEHOLDER COMMENTS AND MTC RESPONSE
EMPLOYMENT LAND / RETAIL / HOUSING LAND

ID Number	Employment land	MTC Comments	Retail Yes – 65.22% 30 No – 34.78% 16	MTC Comments	Housing Land	MTC Comments
67801791			The smaller retail parades should be retained wherever possible	Policy MR2 seeks to do this.		
68309734	All proposals for new facilities and alterations to existing buildings should include sufficient car parking for all staff and visitors off road. Also they should have off road designated loading/delivery areas.	This could only be applied where planning permission is required. Policy MD2 seeks to address car parking provision. Policy SWDP 21: Design criteria xi also addresses parking and servicing.	As above parking for all staff and designated loading/delivery area off road should be provided. Otherwise agree with policy.	Policy MD2 seeks to address car parking provision. Policy SWDP 21: Design criteria xi also addresses parking and servicing.	We do not need any more specialist housing for the elderly. Social housing and affordable housing for young people should be the priority in any plan. New developments should be self-contained (i.e. cul-de-sacs) to prevent creating rat runs for cars.	A Housing Needs Assessment has been undertaken that provides an analysis of the need of different types of housing. This indicates that there is a need for specialist housing for the elderly as well as other types of housing. Policy MD1 seeks to ensure appropriate design for all new development.
68911609			Needs to do more to improve the public realm with lower speed limits, shared streets and more cycle ways. Needs to encourage a better look to town centres with shop fronts reflecting the heritage of the area.	Appendix 6.7 includes a potential project that improves the public realm within Malvern Link and Barnard's Green as well as Spring Lane Industrial Estate. MHDC has a supplementary planning document providing guidance on shop front designs.		
69936905			Construct alternative access road into Roman Way retail park.	This could be included within the list of projects/initiatives in Appendix 6.7.		
70556091	I don't see that placing 300 houses on QinetiQ land safeguards future	The SWDP allocated 4.5ha of the QinetiQ site for employment development.	We will need to except that online shopping may increase and thus make	Policy MR1 recognizes this by supporting development for social, cultural and	Resist expansion along Townsend way east or Newland east	There is not much land within the NPA that is east of either Townsend Way or

	employment	A larger proportion has been allocated for housing. This reduces the need to allocate further land on the edge of Malvern for housing.	shopping areas unsustainable in the long term.	leisure uses as well as traditional town centre uses.	Newland. There is no support within the MNP for further expansion of development into the countryside.
70557604	I understand the SMEs are the bedrock of the economy and should be supported.	Policy ME2 supports small scale development to meet the needs of SMEs.	Local parades are important for an elderly population. Car parking is an issue in the three main centres.	Policy MR2 seeks to protect subject to certain criteria local parades. Policy MT2 seeks to protect and, where possible, increase car parking provision within the centres.	
70608084	If you addressed the other issues, employment would be better. I know 3 people looking for long term employment. Stop all this online only job stuff, if you're out of work you can't afford a computer or internet, Also use handicapped people more, and community service for litter picking etc.	These are not land use planning issues.	Encourage shops that we want no more vets and cafes	Policy MR1 supports appropriate development within the town and district centres and policy MR2 seeks to protect shops within neighbourhood parades.	MTC are not a developer or a builder. The MNP includes a series of policies that seek to ensure that all development within the NPA brings with it benefits for the local environment and community. MTC to investigate the sites referred to and discuss with MHDC.
70917409			Something should be included in the plan to define what sort of retail centre(s) Malvern wants. Without a clear direction of the types of business Malvern wants on its high street there will continue to be a mish-mash that leads to people not knowing what Malvern is for. Which in turn means more short term stays and less continuity.	The retail groups within the three centres were surveyed as part of the evidence base gathering. The vision, objectives, strategy and policies reflect the key points raised through this survey. Policy MR1 recognizes this by supporting development for social, cultural and leisure uses as well as traditional town centre uses.	Use existing empty houses or build a couple of affordable houses in existing housing areas, e.g. top of Goodson road, interfields etc. where there are spaces, what about the appalling waste by the grove school? and the inappropriate Audley Ellerslie taking so long with expensive houses, poor parking etc.
70922915			I think we have enough retail	Noted.	No more gated estates I want a community not a
					A Housing Needs Assessment has been

					<p>series prison enclosure. More houses no more apartment blocks for old incomers. Where are the under 50s going to live? Do you want young people? Your plan doesn't appear to have anything to keep them in Malvern.</p>	<p>undertaken that provides an analysis of the need of different types of housing. This indicates that there is a need for specialist housing for the elderly as well as other types of housing including for young people.</p>
70930617	<p>I don't mind small manufacturing units</p>	<p>Policy ME3 supports manufacturing development within the NPA's existing industrial estates. Policy ME2 supports small scale employment development providing amongst other factors it does not impact on residential amenity. This may therefore preclude manufacturing within residential areas.</p>	<p>The town needs some quality shops, what is does not need are more coffee shops and charity shops.</p>	<p>The market will in most respects dictate that type of retail uses that come forward. Under permitted development rights certain change of uses are allowed without the need for planning permission. In those cases there is no restriction from a planning point of view.</p>		
71154538					<p>History records that large developments (e.g. Malvern Vale) can be fraught with problems for the new embryonic community, including, lack of sufficient car parking (particularly on narrower sections of road), poorly designed/maintained children's play areas, early re-allocation of designated employment zones, foot and cycle paths blocked during development and not re-instated, local authority abandonment of responsibility for amenity areas allowing private company to levy</p>	<p>The issues raised here relate in the main to phasing, implementation and enforcement of approved plans and conditions. The latter is the responsibility of the LPA (MHDC). Policy MI1 seeks to ensure that the appropriate infrastructure for a development is provided in a timely manner. Policy ME1 seeks to protect the existing employment allocations within the SWDP.</p>

					uncontrolled maintenance charges without any reference to or oversight from the local authority. Criteria for future schemes should rule out such errors to avoid alienation of new communities.	
71534594	Only allow building on brown field sites and ensure once permission is given that building starts immediately	This would not comply with NPPF or the relevant statutes.			Only allow building on brown field sites and ensure once permission is given that building starts immediately	This would not comply with NPPF or the relevant statutes.
71535482	Needed for the economic health of Malvern	Noted.	In line with SWDP	Noted.	Agreed –most important to get the mix right and ensure affordable really is so	Noted.
71717540					Resisting building outside the settlement area may cause issues with a lack of housing and may be unsustainable in the long term. How will new housing areas be built inside the settlement area without encroaching on green spaces?	The MNP aligns with the SWDP time period. The SWDP has identified land for development to meet objectively assessed need. The MNP supports new housing development, subject to it meeting relevant criteria, within the settlement. This could be a windfall site such as a school site or employment site and does not necessarily have to be a green space. Policies MG1 and MG2 seek to protect the NPA's green spaces.
72219763					Policy MH1 and everywhere, the most important factor always seems to come last, sustainable design and energy efficient features	The list order does not reflect the importance or otherwise of the issues.
73121550	Lack of distinction of type of industry build on focus on cyber security become a	This is referred to in the Vision and Strategy within the MNP. The policy is more	Support Vibrant local cities, enhance link area	Appendix 6.7 includes support for public realm improvements in Malvern	Do not accept any more Worcester overspill focus on up market housing and	The MNP has to conform to the SWDP. Although Malvern has its own

	<p>centre of excellence for support services for older people.</p>	<p>generic to support employment development and economic growth within the NPA. The allocation at QinetiQ is for R&D uses which does build on Malvern's employment USP.</p>		<p>Link. Policy MR1 supports a range of developments including social, cultural and leisure within the NPA's centres.</p>	<p>low cost affordable for purchase by new home owners. Have vision per Lady Foley- not bolt on estates refresh the SWDP</p>	<p>housing market area it is not isolated from the wider housing market area within south Worcestershire and Herefordshire. The SWDP is at the early stage of being reviewed.</p>
73121577					<p>Save our beautiful countryside</p>	<p>The MNP seeks to protect the existing countryside from development whilst conforming with the NPPF and the SWDP.</p>
73121591			<p>Concern for safe pedestrian access from the bus stop on the new Newland site access to stores boots, M&S etc.</p>	<p>This is a detailed design matters that needs to be addressed through the planning application for the NE Malvern site. SWDP Policy 56 criteria v seeks to address issues around safe pedestrian routes linking Ne Malvern site to the retail park.</p>		

MALVERN NP REGULATION 14 LOCAL RESIDENT AND STAKEHOLDER COMMENTS AND MTC RESPONSE
KEY VIEWS / HERITAGE AREAS / SUSTAINABLE TRANSPORT ROUTES / INFILL DEVELOPMENT / OTHER COMMENTS

ID Number	Key Views (MG3) 13	Heritage areas (MHE2) 11	Sustainable Transport Routes (MT3)	Infill Development (MH3)	Other Comments 15
67801791	From the top of Church Street and Rose Bank Gardens			Infill should be kept to a minimum in all areas to retain a sense of space and scale.	
MTC Comment	This should be included in the consultant's Landscape and Visual Study.			Infill development is an important source of housing supply. Agree that the existing character of an area should not be unacceptably harmed by infill.	
67995897	There are too many to mention but sometimes trees are allowed to grow too tall and obscure the views - e.g. some in Victoria Park		Buses are needed to cover all areas of Malvern but particularly Malvern Link and up to Great Malvern. There is no bus which goes to Malvern Hospital from Malvern Link unless you get on one which takes over 50 minutes to reach it!		
MTC Comment	This should be included in the consultant's Landscape and Visual Study.		MTC to take this up with the bus operators.		
68309734	Views of the hills and from the hills	NO	Worcester Road, Guariford Road	There are no locations in Malvern where I consider infill should be allowed.	No extra comments
MTC Comment	This should be included in the consultant's Landscape and Visual Study.		Guariford Road could include an off-road route subject to agreement with the stakeholders. Worcester Road would need to be on-road.	This would not comply with NPPF or the SWDP. Infill development is an important source of housing supply and potentially reduces the need for development on greenspace and the edge of towns.	
68569633			Bridle paths across the Link common provide sustainable transport routes and their		Must try harder on sustainable transport and green infrastructure.

			surfaces should be upgraded to allow easy cycling. This is included within Appendix 6.7 as a project that MTC wish to pursue with the relevant stakeholders.				Noted. The MNP seeks to address both these issues within a land use planning context.
MTC Comment							
68911609	All areas around the town centre and commons	Great Malvern Town Centre		Most of Great Malvern town area			Overall, it is important that each of the town centre areas are given back to pedestrians and cycles. The concept of shared streets should be introduced into the plan alongside better cycle routes and reduced speed limits on entering gateways into the area.
MTC Comment	This should be included in the consultant's Landscape and Visual Study.	This is already included with the Great Malvern Conservation Area.		This would not comply with NPPF or the SWDP. Infill development is an important source of housing supply and potentially reduces the need for development on greenspace and the edge of towns.			Appendix 6.7 includes projects that MTC wish to pursue. One such project is public realm improvements for Malvern Link and Barnards Green. It also includes pedestrianisation and provision of a town square in Great Malvern. MTC will seek to work with stakeholders on the feasibility of such projects.
68988637				Any more development on Abbey Road.			The priorities have to be support for the widening of the Carrington Bridge and protecting and developing our rail and bus networks.
MTC Comment				Abbey Road is within the Great Malvern Conservation Area and therefore is afforded some level of protection through this designation.			These are major infrastructure projects much of which is outwith the NPA and as such beyond the jurisdiction of the MNP. However, MTC will continue to lobby for improvements to local and strategic transport infrastructure. This is included within the list of projects and initiatives at Appendix 6.7.
69268798							For too long Malvern Link has been poor cousin to Malvern town and its appearance is long overdue for improvement. The signage has been terrible, (Tiger Lilly Nail Bar etc.) but has recently been improved by St. Richard's Hospice and the recent opening of coffee shops. I hope this means there is now some control on signage. A really easy fix to improve its appearance

					<p>would be to plant 2 trees, one at the High Street end of Richmond Road, where there is an ineffective tiered planter and the other on the corner by Evans Chemist.</p> <p>I hope the comments above will be given your attention as this is an ideal time to improve the look of Malvern Link.</p> <p>Appendix 6.7 includes projects that MTC wish to pursue. One such project is public realm improvements for Malvern Link. In terms of shop fronts there is a supplementary planning document produced by MHDC that provides guidance to applicants wishing to change shop fronts and signage.</p>
MTC Comment					
69936905	Tank Quarry and Malvern Link Common	Great Malvern station and general environs. Priory Park.	Develop cycle way from retail park along path behind Ranelagh nunnery to B&Q and extend to Malvern Link to avoid the Worcester Road.	All common land and current green spaces.	
MTC Comment	This should be included in the consultant's Landscape and Visual Study.	These areas are within the Great Malvern Conservation Area.	MTC to investigate the feasibility of this.	Most common land is under the jurisdiction of MHT and protected from development by the Malvern Hills Acts. The MNP includes two policies that seek to protect two different type of greenspaces.	
70560120					<p>I note that in the local press MRFc are vacating the playing fields currently owned by MHDC and that the use will be up for consideration, I bring to the attention that they are Registered Playing Fields and any existing terms and conditions already on the said fields apply.</p> <p>Previous owners MUDC - WCC - MHDC</p> <p>History of the land In the early 1990s a developer submitted plans for a super market on the said land, a petition was raised against it and was signed by 650 local people. An action group was formed myself and</p>

				<p>my neighbor John Smith visited Cllr Squibb chairman of MUDC at that time it discuss the purchase of this land that was designated OPEN LAND from the Earl Beauchamp this what the Cllr said.</p> <p>Earl Beauchamp sold the land to MUDC on the condition that they would remain open space for the community as a natural break between housing and industry MUDC did abide to this agreement but it was never put into writing. I have a copy of the Deeds.</p> <p>The sports Council (midland) GB became involved and they made an application to the department of environment to have it registered as this placed conditions of use on the land. John smith and I were both counter signatories to this application.</p> <p>The land gained registered status and the D of E made it known that it considered a super market did not meet the conditions set against the land but a sports facility was acceptable keeping the fields open space.</p> <p>Tis may be an opportunity for the TC to acquire this Land as LGS/NGS as an extension to Victoria park.</p>
MTC Comment				<p>Is there any opportunity for MTC to acquire the land? The site is proposed to be designated as a neighbourhood green space within the MNP with an associated policy to protect it from development unless certain criteria can be met.</p> <p>Generally a vague document of aspirations, but without any specifics. Approval of the plan could be taken as a blank cheque for future, more detailed plans in the future.</p>
70816439	A449, Pickersleigh Road, Church Street, Barnards Green Road.	Interfields, Bastonford, Madresfield, Newlands		
MTC Comment	MTC to investigate the feasibility of these.	These areas are all outwith the NPA and therefore beyond the jurisdiction of the MNP.		The MNP seeks to produce a set of locally derived planning policies to deal with a range of development scenarios. The principal objective is to seek to ensure that future development

						brings with it benefits to the environment and community. The MNP is a land use planning document and cannot go beyond its scope. However, it does raise at Appendix 6.7 some projects and initiatives that will need to be pursued through other fora.
70917409						This is a good idea to get engagement. However, the website is not all that helpful - for instance, where are any maps or graphics showing the areas talked about. Examples would be useful on a lot of the plan points.
MTC Comment						Noted. At this stage MTC were requesting feedback on where particular areas could be (i.e. Neighbourhood Heritage Areas, Infill Development Restraint Zones, etc). We have some useful responses on these which we now need to investigate.
71154538	Views of a significant upper section of Malvern Hills from Lower Howsell Rd Recreation Ground looking SSW (and of North & End Hills from Lower Howsell Road itself) Welcome views of open countryside & Coppices to the NNE from Lower Howsell Road at the rail bridge (south side)	The collection of old houses of various sizes & types, ex-farm buildings (incl. a number of large and small thatched, at least one of which is listed) seemingly forming the origins of (or part of) the original settlement at Lower Howsell.	The land running alongside the rail line from Malvern Link Station northwards seems to offer an opportunity for development as a sustainable route for residents to the north to/from the station (cycle and pedestrian). Also, the current footpath from the Lower Howsell Road rail bridge to the A449 at Newlands offers potential for development as an extension of the aforementioned for cyclists (possibly also pedestrians) travelling further North/ North East (i.e. to the A449 at Newlands for Powick/ Madresfield etc.)			
MTC Comment	This should be included in the consultant's Landscape and Visual Study.	MTC to investigate this.	MTC to investigate these. The land adjacent to Malvern Link station is			

				identified as a proposed park and ride car park for the station within the MNP. This would not preclude the provision of a cycle link north. There is a change in level between this land and Church Road.			
71535482	Hayslan fields key view point	Belle Vue Terrace Area including Abbey Gateway and Post Office and Tourist Information building, Barclays Bank and Unicorn, Malvern Theatres		All new developments to include cycle paths separate from pedestrian and road. Improved bus service to access the Hills from key points in town so walkers can hop on hop off. This would help the older not as fit walker gain access currently obtained by car or not at all.	Avenue Road		
MTC Comment	This should be included in the consultant's Landscape and Visual Study.	These areas are within the Great Malvern Conservation Area.		The first point could only apply to large scale development for it to be viable and feasible. MTC to investigate service provision with bus operators.	Avenue Road is within the Great Malvern Conservation Area and therefore is afforded some level of protection through this designation.		
71865684	Many places within Malvern	Area around museum		Townsend Way	Playing fields off Sling Lane/Madresfield Road/ Haslam Road		For this vision to work you need to make sure the developer sticks to the planning agreement. They are often reluctant to do this. This particularly relates to housing land.
MTC Comment	Noted.	This area is within the Great Malvern Conservation Area.		MTC to investigate this.	The MNP includes two policies that seek to protect two different type of greenspaces..		This is the responsibility of the Local Planning Authority (MHDC).
72014839	Link Common, Wyche cutting and the road to it. Common land below and to the side			Not Somers road			I have made my thoughts on the Transport Plan clear under the appropriate section
MTC Comment	This should be included in the consultant's Landscape and Visual Study.			Noted.			Noted.
73021017							Malvern needs more car parks; most of the roads are too full with parked cars making driving a nightmare.
MTC							The MNP includes policy MRT2 'Car parking'

Comment					which seeks to protect existing car parks and where possible provide new car parks within the town and district centres.
73541088	Extensive rural and townscape views from higher ground over severn valley, most notably from the Worcester and wells road (A449) through Great Malvern – between properties from Link top (also across Link common), Rose Bank Gardens, Similar views across valley but also towards hills from priory park, Link Common extensive views towards the hills from the lower level parts of the Np area, notably including Hayslan fields, Worcester Road, Townsend Way and Barnards Green	Each of the 3 Conservation Areas, with particular regard to Statutory Listed Buildings (Grades I III# II), those properties identified by MTC and MCS for inclusion on MHDCs Local List. Special attention needs to be paid to buildings at risk in these areas, especially the convent of the Holy name, Holly rood house, The Old community Hospital and Malvern	There are limited opportunities on account of roads being insufficiently wide to accommodate cycle paths. Further development of the system along Townsend way on beyond North End Lane and Pickersleigh road could be considered.	Infilling on sites with larger gardens mainly in the Great Malvern Conservation Area and associated mostly with Victorian Mansions (either currently single occupancy dwellings or multiple occupancy conversions (flats). This is affecting significantly the original layout and spatial elements which have created the distinctive nature of the Great Malvern Conservation Area.	
MTC Comment	This should be included in the consultant's Landscape and Visual Study.	These areas are already statutorily designated which provides more protection than a Neighbourhood Heritage Area designation within the MNP.	MTC to investigate this.	Great Malvern Conservation Area is afforded some level of protection through this designation.	
73121517					There is too much planning gobbledey gook for the average resident to understand, e.g. what is a neighbourhood parade? Give examples Which Neighbourhood conservation assets? give examples Which non- designated heritage assets - give examples Neighbourhood heritage areas (micro generation) Noted. It is difficult within a statutory land use plan not to include reference to planning terminology. Some examples are given.
MTC Comment					

					Definitions of some of the terms could be included within the glossary.
73121591					Woe unto them that join house to house that lay field to field, till there be no place that they may be placed alone in the midst of the Earth!! Isaiah 5 v8
MTC Comment 73121630					Noted. I have read carefully all the proposals put forward for the transformation of Malvern. At first, I thought I was reading about a different town altogether! All the ideas seem very desirable but you can't get away from the fact that Malvern is a small town, built on hills with narrow streets and no parking!! Before anything else the most important thing is to rescue the town centre from the mess it is in now, providing decent parking for the citizens and including such things as double decker buses!! Basically, you have allowed too many cafes and restaurants to open in the centre area, all of which require constant replenishment by huge delivery lorries. There are aspects of the MNP that are pragmatic and those that are aspirational. However, it is considered important that the latter are included within the plan as it can be used to demonstrate, through the referendum, the support locally which could in turn assist in funding bids and allocations. The MNP includes policies relating to the town and district centres and car parking that seek to address these issues in relation to any future developments.

MHDC INFORMAL COMMENTS SEPTEMBER 2018 AND MTC RESPONSE

Malvern Neighbourhood Plan - Informal Consultation Version -September 2018 Schedule of Malvern Hills District Council Planning Officer Comments and MTC Response

Green Infrastructure		MTC Response
MG1: Local Green Space	OK	Noted.
MG2: Neighbourhood Open Space	<p>In relation to criteria 3, It is considered that the policy cannot require a visual improvement of a nearby Neighbourhood Open Space unless there is a planning obligation that links the sites and the improvement is required as a mitigation of the development.</p> <p>Criteria 4 - some of the Neighbourhood Open Spaces may not have links to other areas, in which case they cannot retain the link. But, the criteria does say "where relevant"</p> <p>MG2B – new. OK</p> <p>Appendix 5.3 helpfully describes the function each green space performs.</p>	<p>Criteria 3 has been amended to read:</p> <p>i) Improvements are made to the visual amenity and/or nature conservation value of any retained area of NOS following the development, or</p> <p>ii) In cases where the whole NOS is to be developed improvements to visual amenity and nature conservation should be made to a nearby NOS site which provides an overall benefit to the character of the local area which will be achieved through a legal agreement;</p> <p>The where relevant in the wording to criteria 4 is considered to deal with the scenario where there are no links.</p> <p>Noted.</p> <p>Noted.</p>
MG3: Woodland, Trees & Hedgerows	<p>Quite a complicated policy. Could decision makers apply it consistently and with confidence when determining planning applications? How would a decision maker define "exceptional cases where such developments are deemed acceptable"? Would it be better to say that "Development that damages or results in the loss of ancient trees or woodland will not be permitted unless the need for, and benefits of, the development in that location clearly outweigh any</p>	<p>There were no such concerns raised in the Health Check and a similar worded policy has been included within a made NP elsewhere.</p> <p>The policy has been amended to reflect this wording.</p>

	loss."?	The policy indicates that this should be secured through a legal agreement.
Visual Amenity MV1: Key Views & Vistas	<p>Planning policies can seek to protect specific views where this is justified in the wider public interest (for example from a public footpath, right of way, roadside, or other publically accessible land).</p> <p>It is suggested that:</p> <ul style="list-style-type: none"> • A clear justification is provided for the protection of each view. • Photographs of the views in an Appendix would be helpful to provide additional clarity to assist decision making. Any photographs need to match the direction and extent of the views shown on the proposals map. 	<p>Since the receipt of these comments the Visual Study has been drafted and went out for public consultation. Has a result of the comments received from the consultation (which MHDC made representations) and the Health Check further changes have been made to the policy and its accompanying figure. The policy now reads:</p> <p>‘Development proposals should not adversely affect, and where possible, should enhance, the existing character, quality and value of the Exceptional Key Views identified on Figure 5.3 and described in the Visual Study Report.</p> <p>Development proposals are encouraged to consider other Key Views as described in the Visual Study Report, where relevant.’</p> <p>The Visual Study has also been amended and includes within its appendix the justification along with photographs of each selected key view.</p>
Heritage MHE1: Non-Designated Heritage Assets MHE2: Neighbourhood Heritage Areas	<p>OK, but apart from non-designated historic assets on the Local List, what other non-designated assets does the policy apply to?</p> <p>To provide clarity for applicants and decision makers, it might be useful to list the neighbourhood heritage areas in the policy.</p> <p>As currently worded, it might be difficult for a</p>	<p>MTC is committed to submitting further buildings to MHDC for nomination on the Local List in the future. The policy will apply to these buildings and any others where evidence is provided to demonstrate their local historic and/or architectural value.</p> <p>The policy has been amended to include the list of NHAs.</p> <p>There were no such concerns raised in the Health Check.</p>

	decision maker to apply the policy consistently and with confidence when determining planning applications.	However, the policy wording has been amended slightly to make it clearer for users.
Community Facilities		
MC1: Community Infrastructure	The term "Community Infrastructure" is slightly confusing. Community Facilities would probably be more appropriate.	The policy title has been amended.
MC2: Healthy Communities	<p>Definition of major development – need a glossary. Planning for Health SPD relates to 50+ dwellings.</p> <p>The Reasoned Justification for Policy MC2 provides no evidence that there is insufficient capacity within General Practice and Dental Services. Further, if there is evidence relating to insufficient capacity the MNP has not taken the opportunity to propose sites to accommodate an increase in services within the neighbourhood area.</p> <p>Regarding the first part of the policy it is considered that if a development attracts GIL, funds could go towards Strategic Health facilities, so it could be catered for in that way. For smaller sites, it is considered that there would be insufficient grounds to refuse an application in a town on the grounds that there was insufficient health care, but it may be possible to seek a financial contribution to a GP practice/ Dental Practice.</p> <p>Generally, it is considered that it would be more</p>	<p>Additional evidence and information has since been provided by the SWCCG a summary of which is included within the R.J. Further information is included within the Local Health Profiles submitted with the NP.</p> <p>As a consequence of this additional information it is considered appropriate to retain the policy wording. The policy seeks to enshrine the principles of the SPD on Planning for Health within a NP policy thereby affording it greater weight in decision taking.</p>

	<p>appropriate for the health authority to ask for contributions based on their specific information, rather than seeking developers to obtain such information. It may be worth noting that paragraph 2.6.11 of the South Worcestershire Councils Developer Contributions SPD says that "Contributions for developments of 50 dwellings or less will only be sought where there is significant existing over subscription of GP lists, i.e. GPs with over 110% of the recommended maximum number of patients. The potential to increase capacity at the relevant health centres without breaching the pooling restrictions for developer contributions will be considered on a case by case basis".</p>	
<p>Design MD1: Design & Accessibility Principles</p>	<p>In the previous draft major development proposals were required to submit a Design & Access Statement, now it's proposed that all development proposals submit such a statement. This will not be proportionate for all development proposals.</p> <p>It is considered that some elements of MD1 (eg take account of design guidance for and views to and from Malvern Hills AONB and its buffer zone) are not drafted with sufficient clarity that it could be applied consistently and with confidence by decision makers.</p> <p>Some elements of MD1 appear to repeat themselves – eg A4 and A9 both seem to relate to the aesthetics of a building and reinforcing the</p>	<p>As a result of comments from the Health Check the contents of this policy is now covered within three policies:</p> <p>MD1: Building Design and Accessibility MD2: Landscaping and Public Realm MD3: Promoting Sustainable Design</p> <p>It is hoped that this will provide greater clarity for users and decision takers.</p> <p>Dealt with in the redraft of the polices.</p>

	<p>character of the area.</p> <p>Delete reference to West Lancashire Borough Council.</p> <p>MD1 will not be proportionate for all development proposals.</p>	<p>Removed.</p> <p>Dealt with in the redraft of the policy.</p>
<p>MD2: Microgeneration</p>	<p>MD2 does not appear to relate to the generation of energy from renewable or low carbon sources. The policy appears to be solely about visual impact which is already currently covered by MD1.</p> <p>Para 5.5.14 is very unclear. On the one hand, the para acknowledges that many types of microgeneration are permitted development. On the other hand, it implies that it will apply where SWDP27 is applied – which in many cases, permitted development will also apply.</p> <p>The application of MD2 seems muddled. Would it apply to the installation of solar panels and air source heat pumps on new development? If yes, who (and more to the point, how) will it be determined whether microgeneration would be an unacceptable adverse impact? It is considered that MD2 could conflict with SWDP27.</p>	<p>Now policy MD4 as a result of the changes to MD1. These issues are picked up in MD3: Promoting sustainable design.</p> <p>There were no such concerns raised in the Health Check.</p> <p>It is considered that the RJ explains in what circumstances the policy is to be applied.</p>
<p>Transport MT1: Transport & Development</p>	<p>Much of Policy MT1 is already covered by SWDP 4 (Managing Travel Demand)</p>	<p>There is no conflict with SWDP4 and the NP policy provides a local perspective on what many within the community consider to be a major issue within the NPA.</p>

<p>MT2: Town Centre & District Centres Car Parking</p>	<p>MT2B2 – Is it essential that any proposal to increase car parking includes provision for “sustainable transport measures”?</p> <p>The final paragraph of MT2 relating to a proportion of parking spaces for larger cars is vague and could not be applied consistently and with confidence by decision makers. Also, if there were parking spaces for larger cars, how would it be possible to prevent smaller cars using those spaces?</p>	<p>Noted and agreed. The policy reinforces the point.</p> <p>This part of the policy recognises the increase in large cars and the need for larger bays and the fact that there is no change in the adopted standards to reflect this. It therefore seeks to encourage developers to look at this issue.</p> <p>This is a management issue and not a land use issue.</p>
<p>MT3: Malvern Link Railway Station Opportunity Area</p>	<p>The Reasoned Justification does not explain why the land is proposed as an “opportunity area” rather than a site allocation.</p> <p>The policy provides no indication of the number of car parking spaces that could be created and there is no indication about whether the landowners would be willing to make the land available for car parking.</p> <p>Why are the criteria in MT3 different from MT2?</p>	<p>There were no such concerns raised in the Health Check.</p> <p>This is now dealt with in the RJ.</p> <p>This has been amended so there is consistency across all the MT policies on this issue.</p>
<p>MT4: Electric Vehicle Charging Points</p>	<p>Interesting policy.</p> <p>Principle of the policy seems to have regard to para 110 of NPPF.</p> <p>An EVCP for each car parking space probably isn't proportionate. For example, would the car park developed under MT3 have to provide 20% active and 80% passive spaces? There could be a lot of unused parking spaces.</p>	<p>The policy and RJ has been amended slightly to deal with this issue and comments raised in the Health Check.</p>

Infrastructure	<p>The intention of MI1 seems to be that it is expected that the provision of infrastructure required to support development proposed will be provided in a timely manner and no later than the appropriate phase of development for which it is required.</p> <p>MI1 requires proposals for 10 – 199 dwellings to submit a Statement of infrastructure requirements and proposals for 200+ dwellings to submit an Infrastructure Delivery Statement. It is not clear that the submission of such statements will achieve the objective of the policy.</p> <p>The purpose of Policy MI1 appears to be the same as SWDP 7 (Infrastructure). It would be helpful if the Reasoned Justification included reference to SWDP 7.</p>	<p>Noted and agreed.</p> <p>The submission of an IDS will help to demonstrate that the provision of infrastructure required for the development is to be provided in line with the policy requirements. This will help both the decision taker and other stakeholders in assessing whether the proposals comply with the policy.</p> <p>This is now included.</p>
MI2: High Quality Communications Infrastructure	<p>Ok.</p> <p>Why is Malvern Hills AONB specifically mentioned, including “its buffer zone”? Is the buffer zone defined?</p>	<p>The term buffer has been removed and replaced by setting.</p>
Employment Land	<p>ME1: Protecting Employment Allocations</p> <p>SWDP 53 (Qinetic) allocates at least 4.5ha for B1(b) (or associated uses). SWDP 56 (North East Malvern) allocates 10ha for “employment-generating uses.</p> <p>Para 5.8.1 seems to propose that that the 10ha</p>	<p>This policy and RJ has been amended to respond to these comments and suggestions made in the Health Check.</p>

	<p>at North East Malvern should specifically be for B1, B2 or B8 uses. If this is the case, it is suggested that this be made more explicit in Policy ME1, not simply the supporting text.</p>	
<p>ME2: Provision of Micro & Small Scale Business Development</p>	<p>Policy ME2 is more permissive than SWDP 8E in that it also supports extensions of existing buildings. It is considered that this could lead to applications for extensions under the justification of being for "home based working" space. Is this what is intended? It should be noted that some home-based businesses do not need planning permission, and extensions would be considered on their general design merits rather than in relation to a business use.</p> <p>The policy is very wide in its scope because it relates to the expansion of existing employment premises on the one hand and change of use / conversion of other existing buildings on the other hand. Should these issues be addressed in separate policies?</p> <p>To be supported, do proposals need to meet all of the criteria? As currently worded, proposals do not have to meet all the criteria.</p> <p>Criteria 6 is only relevant to an existing employment site.</p> <p>Could some of the issues referred to in para 5.8.8 (eg hours of operation, noise etc) be included in the policy?</p>	<p>There were no such concerns raised in the Health Check.</p> <p>Proposals for extensions would be considered against relevant design policy and guidance.</p> <p>Noted.</p> <p>The policy has been amended to reflect this.</p> <p>The policy states 'where relevant' before the list of criteria.</p> <p>The words 'open countryside' are added to clarify when this criteria is relevant.</p> <p>It is considered these matters are up to the decision taker on a case by case basis and are best kept in the RJ.</p>
<p>ME3: Existing</p>	<p>ME3 continues to be long, convoluted and in</p>	<p>As a result of these comments and suggestions made in the</p>

<p>Industrial Estates & Business Parks</p>	<p>places quite confusing.</p> <p>ME3A1 – “County Matter” needs to be defined in a glossary.</p> <p>ME3A5 – need to define major developments.</p> <p>ME3A6 – need define major office developments. Should be noted that the sequential test in SWDP10C relates to retail and leisure development.</p> <p>ME3B1 says development of non B1, B2 and B8 uses will only supported if it has been demonstrated that the site / premises is no longer commercially viable for employment use. But what if it is viable for employment use which is not B1, B2 or B8?</p> <p>ME3B3 – seems to imply that non B1, B2 or B8 use at premises would be supported, but only if the use was ancillary to the principal B1, B2 or B8 use. This seems to imply that premises still have to be B1, B2 or B8 use.</p> <p>ME3B4 – would be difficult for a decision maker to apply consistently and with confidence.</p> <p>ME3C1 - It is not clear why replacement of an existing non-B1, B2 or B8 use should be replaced by the same use class as the existing established use. ME3C1 would not appear to support the replacement of, say an existing established B8 use with B1 or B2 use. Is this what is intended?</p> <p>ME3C4 – need to define major developments.</p> <p>It is suggested that Part C (like-for-like</p>	<p>Health Check this policy has now been split into two:</p> <ul style="list-style-type: none"> • ME3: Employment Development within Existing Industrial Estates and Business Parks • ME4: Non-Employment Development within Existing Industrial Estates and Business Parks <p>This will hopefully deal with all the comments raised.</p>
--	---	---

	<p>replacements of existing non-B1, B2 and B8 uses) could be covered by Part B (development for non-B1, B2 and B8 use classes). In light of this, it is suggested that Part C of the policy could be deleted.</p>	
Retail Land		
MR1: Town & District Centres	Ok	Noted. Amendments have been made to the policy as a result of comments raised in the Health Check.
MR2: Neighbourhood Parades	MR2 is more stringent than SWDP10. SWDP 10I says change of use will only be supported if there is an alternative within walking distance or evidence is provided that the premises are no longer viable. MR2 requires that criteria MR2(1) and MR2(3) are met. It is suggested that the criteria should be MR2(1) or MR2(3).	The policy has been amended to reflect these comments.
Housing Land		
MH1: Housing Mix	<p>Para 5.10.3 indicates that a Housing Needs Assessment (HNA) was undertaken in February 2016 and that the need in the Malvern Neighbourhood Area was 1,988 for the period 2006 – 2030. Surely the HNA assessed current and future need, not past need. If so, surely the level of need is 2016 – 2030?</p> <p>As currently worded I think MH1 would be very difficult for a decision maker to apply consistently and with confidence. How is a decision maker going to assess applications against the HNA / SHMA? It may be worth noting that the Hanley Castle NDP, which has just been examined, provides decision makers with a steer about the required housing mix. The Hanley Castle housing mix policy says:</p>	<p>This has been amended to refer to requirement.</p> <p>The policy has been amended to reflect these comments.</p>

	<p><i>Proposals for new housing should deliver a range of house types, sizes and tenures. There is particular need for:</i></p> <ul style="list-style-type: none"> • <i>Affordable housing</i> • <i>Starter homes</i> • <i>Two and three bedroom family homes</i> • <i>Homes for the elderly or disabled</i> <p><i>Applicants should demonstrate how the proposal will meet these local needs.</i></p>	
<p>MH2: New Residential Development Within The Development Boundary</p>	<p>Surely, the purpose of MH2 is to say where new housing development will be appropriate?</p> <p>ie, New residential development within the development boundary will be supported when it meets the following:</p> <ul style="list-style-type: none"> a) It is infill development that seeks to use land that is not of high environmental value; or b) It is for the conversion, re-use or extension of an existing building; and c) It accords with other relevant policies of the NDP and SWDP. <p>It is considered that most of the criteria in MH2 simply duplicate design and access issues covered by other policies in the NDP.</p>	<p>The policy has been amended to reflect these comments.</p>
<p>MH3: New Residential Development Beyond The Development Boundary</p>	<p>OK.</p> <p>In the final paragraph of MH3 it is suggested that the two sentences are made separate paragraphs because conversions are a separate issue from extensions.</p>	<p>The policy has been amended to reflect these comments.</p>

<p>Glossary</p>	<p>NDP should include a glossary.</p> <p>There are several references to the AONB and its buffer zone. Has the buffer zone been defined?</p>	<p>There is a glossary at the front of the document and a number of footnotes provide explanations to terms used in the NP. Buffer has been replaced with setting.</p>
------------------------	--	--