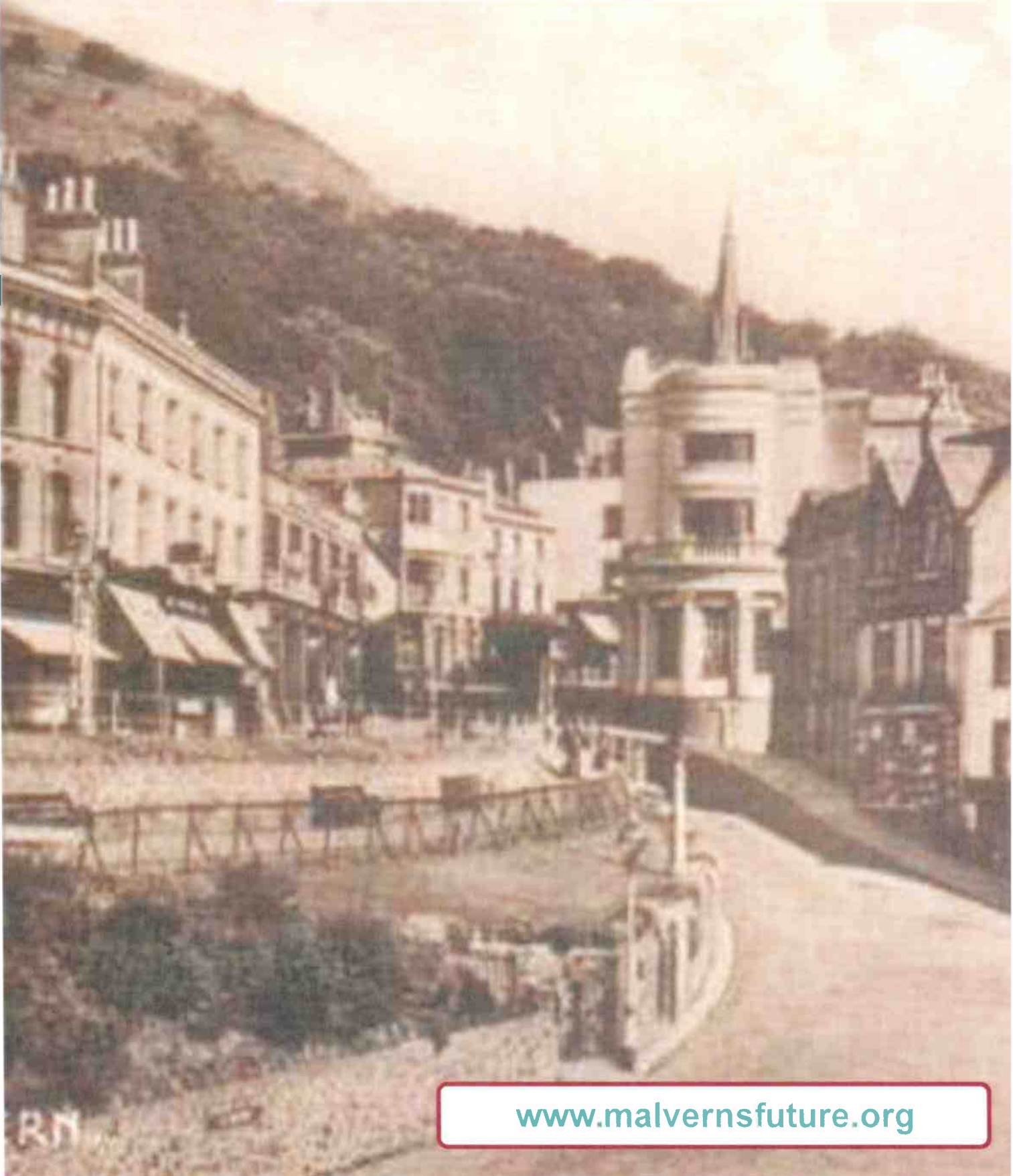


MALVERN'S FUTURE QUESTIONNAIRE (AUGUST 2015)



Malvern's FUTURE



RN

www.malvernsfuture.org

What is a Neighbourhood Plan?

The Government has developed Neighbourhood Plans as part of the Localism Act, to give communities greater involvement in the development of their local area. Neighbourhood Plans can:

- suggest ways to improve existing facilities
- identify new facilities or amenities from which we can all benefit
- identify local issues and opportunities, and suggest solutions
- contribute to the conservation and enhancement of both the natural and built environments within our community
- manage development, not prevent it

Malvern's Neighbourhood Plan could:

- set design policies and quality standards for future developments (a Malvern Design Code)
- protect specific land uses in certain areas (such as open spaces)
- introduce requirements for the provision of community facilities in new developments (such as shops, sports/play facilities, or allotments)



Have Your Say Be Part of Malvern's Future

How can we create jobs and increase prosperity?

What sort of roads, parking, and schools do we need?

What sort of homes should be built?

Progress So Far

Neighbourhood Plans have to go through several stages before they can be submitted for examination by an Independent Inspector, and adopted by the community.

1. Identification of Evidence



2. Building Evidence Base



3. Creation of Vision & Objectives



4. Production of Policy Options



5. Preparation of Draft Plan



6. Consultation & Submission

Malvern's Neighbourhood Plan is intended to ensure that our town develops in the way that we want it to over the next 20 years, so it can't be drafted quickly!

Malvern's Neighbourhood Plan will need to be adopted by a public referendum, so in order to get it right we need your help.

Currently, the Plan is in Stages 2 & 3, Building Evidence Base and Creation of Vision and Objectives, and we need as

much input from the people of Malvern as possible.

We have carried out several community consultation meetings so far, but we still need to hear YOUR views!

What Are Our Main Topics?

To date, the Neighbourhood Plan Steering Group have focused on the following main topic areas:

- Housing
- Working and Shopping
- Getting Around
- Environment, Sustainability and Design Quality
- Leisure and Wellbeing
- Lifelong Learning
- Health and Social Care

What do you think? Have we covered everything?
What have we missed?



Have Your Say

What Issues Arise From the Main Topics?

The South Worcestershire Development Plan will set out the strategic plan for Malvern; the Neighbourhood Plan fills in the important details. New homes will be built, but what sort of homes should they be, and what infrastructure is required to support them?

Jobs and Enterprise – how can they be attracted to Malvern and encouraged to thrive?

Transport – how can transport links be improved, and how do they fit together?

Environment – is carbon-neutral or ‘green’ housing something that should be considered? And how far should the AONB and SSSI be protected from development?



Malvern's Future?

How Can I Get Involved?

Join Us Online

All the latest news and information can be found on our Facebook page, our Twitter feed, and our website; like, follow, and bookmark us to stay in touch:



facebook.com/malvernsfuture



twitter.com/malvern_future



Scan this code with your tablet or smartphone, or visit www.malvernsfuture.org

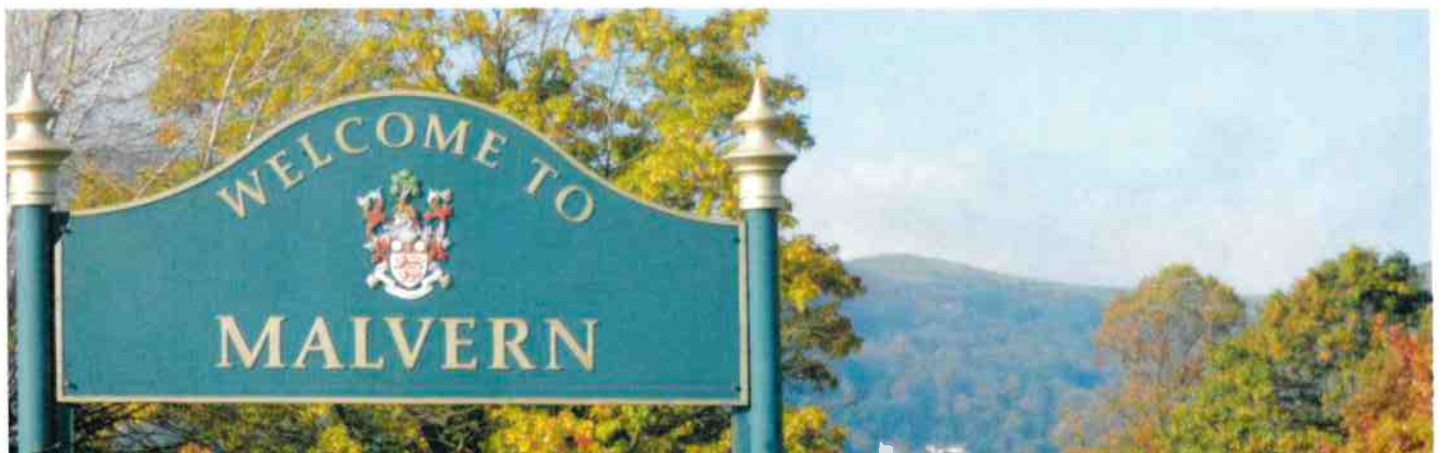
Have Your Say

The most valuable thing you can do is to give us your feedback. Just fill out and return the form at the back of this leaflet, or email your thoughts to info@malvernsfuture.org

Help the Steering Group

Malvern Town Council is leading the development of Malvern's Neighbourhood Plan, but we need your involvement to ensure that it properly represents the community. You can take an active role in researching and consulting, raising awareness, and helping to draft the Plan itself.

Contact Clare or Ead on 01684 566667 to find out more, or email info@malvernsfuture.org.





Malvern's FUTURE



Have Your Say

Here are some questions that will help to shape the Neighbourhood Plan. Once you've filled it in, tear it off and return it to **Malvern Town Council**, 28-30 Belle Vue Terrace, Malvern, **WR14 4PZ**, by **19th October 2015**. You can also email your responses to info@malvernsfuture.org.

Name

Age Group (please tick)

- 18 – 25
- 26 – 35
- 36 – 45
- 46 – 55
- 56 – 65
- 65 +

Address

Email*

*I would like to receive email updates about the Neighbourhood Plan (all information collected will be held confidentially by Malvern Town Council in accordance with the Data Protection Act 1998)

Rate These Issues From 1 To 10 In Order Of Their Importance To You

- | | |
|---|--|
| <input type="checkbox"/> Housing | <input type="checkbox"/> Transport, Roads and Traffic |
| <input type="checkbox"/> Shopping & Retail | <input type="checkbox"/> Health & Social Care Facilities |
| <input type="checkbox"/> Sustainable Living | <input type="checkbox"/> Leisure & Recreation Facilities |
| <input type="checkbox"/> Education and Learning | <input type="checkbox"/> Environmental Issues |
| <input type="checkbox"/> Open Spaces | <input type="checkbox"/> Jobs & Business Growth |

Please list any issues that are important to you but that are not covered above:

What three things do you like most about living in Malvern as it is now?

What three things most frustrate you about living in Malvern?

What three improvements would make Malvern a better place to live?

MALVERN'S FUTURE QUESTIONNAIRE; SUMMARY NOTE (DECEMBER 2015)

MALVERN NEIGHBOURHOOD PLAN

MALVERN'S FUTURE QUESTIONNAIRE:

SUMMARY NOTE

Q4: Please list any issues that are important to you but are not covered above

- 1 No to cable car
- 2 Protect the hills, commons, open spaces and playing fields
- 3 Museum – Showcasing science/technology (radar and water cure)
- 4 Malvern Old Hospital
- 5 Infrastructure for new development
- 6 Crematorium
- 7 Broadband
- 8 Parking – quantity, charging
- 9 Sustainable/green housing
- 10 Separate cycle route to Worcester
- 11 Traffic congestion
- 12 Access to Town Centre

Q5: What three things do you like most about living in Malvern as it is now?

- 1 The Hills and open spaces (commons, parks, etc.)
- 2 Amenities such as theatres, cinema, library
- 3 Low crime and security
- 4 Size of the town – appropriately sized
- 5 Community – good sense of community
- 6 Accessibility of town to Worcester and other areas

Q6: What three things most frustrate you about living in Malvern?

- 1 Traffic – congestion, too much, speeding
- 2 Parking – lack of parking, illegal parking
- 3 Development in green spaces
- 4 Lack of independent shops
- 5 Rail services slow
- 6 Access to motorway slow
- 7 Development and lack of appropriate infrastructure
- 8 Lack of facilities for young people
- 9 Idea of cable car on the Hills

Q7: What three improvements would make Malvern a better place to live?

- 1 Housing – more social housing, smaller housing for families, affordable homes
- 2 Better transport links – improved train and bus services, bypass, cycle routes, access to M5
- 3 Better traffic management and enforcement
- 4 Improved access to Hills for less able and disabled – cable car, funicular railway, electric road train
- 5 Improvements to Malvern Town Centre – greater variety of shops, town square or focal point, pedestrianise Church St High St
- 6 Improvements to parking – free parking in town centre, on-street restrictions, free for visitors vs free for residents, cycle parking, more parking at Stations, multi-storey car park
- 7 Ensure sufficient infrastructure in place for new development
- 8 Design of new housing – vernacular/eco-friendly
- 9 Improved facilities for youth and young people
- 10 Better broadband
- 11 Redevelop Post Office in Malvern Town Centre
- 12 New facilities such as
 - 12.1 Museum of Science & Technology
 - 12.2 Visitor Centre
 - 12.3 Youth Hostel
 - 12.4 Concert Venue
 - 12.5 Café at the Beacon
- 13 Farmers market and other markets
- 14 Pavements – maintenance and cleansing
- 15 Improved recycling collection
- 16 Improved police presence

NEIGHBOURHOOD PLAN POLICY REVIEW EVENT AT THE LYTTLETON ROOMS (JULY
2017)

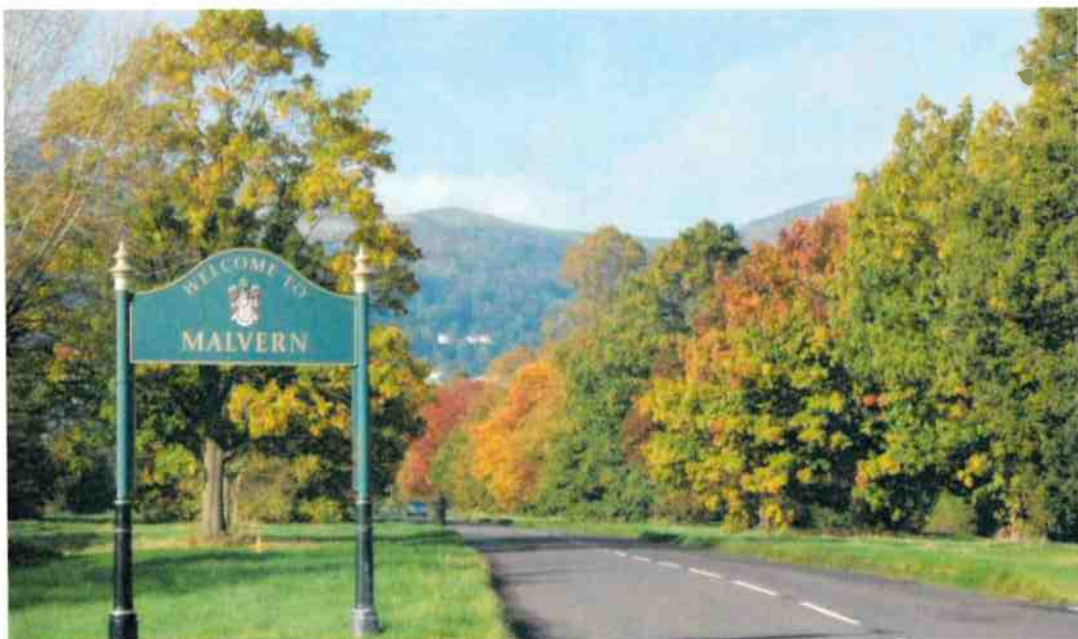
Introduction

Neighbourhood Planning

The Malvern Neighbourhood Plan (MNP) is part of the Government's approach to land use planning. The Neighbourhood Plan (NP) process enables communities to better shape their area, inform how development takes place and helps to influence the type, quality and location of that development. However, there are some important rules that a Neighbourhood Plan must follow. These are known as the 'basic conditions:

- **They must have appropriate regard to National Policy**
- **They must contribute to the achievement of sustainable development**
- **They must be in general conformity with the strategic policies in the development plan for the local area**
- **They must be compatible with European Union (EU) obligations, including human rights requirements**

The above will be tested through an independent examination and checked by Malvern Hills District Council (MHDC) prior to proceeding to a Referendum where local residents will be able to vote on whether or not the Plan should be used to assess planning applications within the Town Council area.



The Story So Far.....

On 6 May 2014 Malvern Town Council (MTC) resolved to produce a Neighbourhood Plan and has carried out a number of engagement and consultation exercises with local residents:

- **3 November 2014 – public meeting at Dyson Perrins Academy**
- **9 April 2015 – Neighbourhood Planning Open Day event at the Abbey Hotel**
- **June 2015 – Tour of Malvern’s neighbourhoods. (Local Issues Week)**
- **September – October 2015 – Questionnaire to all households in the Neighbourhood Plan Area (NPA)**

In October 2015, MTC engaged Peter Hamilton (NP Consultant) of Cass Associates to professionally progress Malvern’s NP. Following Peter’s advice and instruction, MTC set up a number of Working Groups, with volunteers from the local community, to look at a number of issues within nine key themes including:

- **Business and employment**
- **Local and Neighbourhood Centres**
- **Travel and Transport**
- **Visitor Economy**
- **Design**
- **Heritage (non-designated heritage assets)**
- **Green Spaces**
- **Nature Conservation (local conservation assets)**
- **Youth Provision**

As well as the work undertaken by the Working Groups above, MTC used a number of sources as evidence base to support the Neighbourhood Plan including:

- **The SWDP and its evidence base (where relevant to the NPA)**
- **Evidence Base Report by Cass Associates July 2016 (Updated March 2017)**
- **Housing Needs Assessment for Malvern Town Council by AECOM (Feb 2016)**
- **Heritage Character Assessment for Malvern Town Council by AECOM (due summer 2017)**
- **Protected/notable species and designated sites information by Worcestershire Biological Records Centre (December 2016)**

The Vision

Our vision is that Malvern continues to be a vibrant, prosperous, safe and accessible Town where new development and its occupiers are fully integrated, whilst protecting The Hills, the Commons, green spaces and countryside, some of which are designated as an Area of Outstanding Natural Beauty (AONB) and Site of Special Scientific Interest (SSSI).

Our vision is that the NPA will have a diverse range of services and facilities within Great Malvern, Malvern Link and Barnard's Green. The main retail centres will be aesthetically improved making them more pleasant and attractive places to work, visit and shop.

Our vision is for an expansion of high-quality employment premises, based around the technology, electronics, digital and research sectors. Development at Malvern Science Park, Malvern Technology Centre (QinetiQ) and North East Malvern will provide increased jobs and economic growth for the local community. Spring Lane Industrial Estate will continue to provide a variety of industrial and commercial uses and will have improved public realm including pavements, landscaping, fencing, cycle lanes, off-street car parking and bus routes. There will also be a broadening of the Area's tourism assets which will hopefully provide further jobs and economic growth for the local economy.

The future development and growth of the Town will be managed through appropriate improvements to infrastructure, services and utilities. The area's sensitive setting including landscape, heritage, nature conservation and green infrastructure will be retained.

By aspiring to fulfil the above vision the Neighbourhood Plan will play an important role in ensuring that Malvern continues to be an outstanding environment for its current and future residents, workers and visitors.

The Objectives

To achieve this Vision the Town Council has identified 12 objectives for the Plan.

1. Support and encourage new housing of high quality and sustainable design, responding to local character and adding to the overall quality of the area whilst meeting local housing needs for both market and social sectors at an affordable price.
2. Support and encourage a range of modern, sustainable and high quality industrial and business premises which provide opportunities for economic growth and employment whilst creating attractive and accessible environments.
3. Support and encourage a diverse range of retail and other associated town centre uses to meet the everyday needs of the Town's expanded community. Enhance the public realm and environments of the key centres to create vibrant retail, social and cultural hubs for the area.
4. Strengthen and support the area's tourism assets and associated infrastructure to increase the visitor numbers to the NPA and provide opportunities for additional local businesses and employment.
5. Improve the existing infrastructure and utilities ensuring that new development does not exacerbate existing problems and, where appropriate, contributes towards improving the existing network.
6. Ensure the wider integration, co-ordination and connectivity of the existing transport infrastructure. This will include improvements to the road and rail services to and from the area, improvements to bus provision, measures to reduce traffic congestion, promotion of cycling and the protection and enhancement of parking provision.
7. Protect and enhance the area's landscape and nature conservation assets including the Hills and Commons and Malvern's green spaces.
8. Protect and enrich the area's heritage assets and historic environment. Ensure new development sustains and enhances the heritage and character of the area.

9. Support and encourage a diverse range of education, health, leisure, recreation and social facilities to meet the everyday needs of the community and protect, where possible, these facilities where there is a demonstrated need.
10. Sustain and improve the vitality, health, wellbeing and safety of the people of Malvern through the provision and protection of appropriate facilities such as green space, cycle and pedestrian routes and health facilities.
11. Support and encourage sustainable development and reduce carbon-dependent activities.
12. Retain the existing character of Malvern's historic spa town and its countryside setting adjacent to the Hills and Commons and ensure that new development enhances this character and is fully integrated into the fabric and infrastructure of the area.



Policies

Housing

MH1: Housing Mix – this policy seeks to ensure that new residential development of 5 or more units takes account of local housing need including for low-cost market housing, affordable social housing and specialist housing for the elderly. This will be demonstrated through the submission of a Local Housing Provision Statement (LHPS) with the planning application.

MH2: New Residential Development – this policy seeks to ensure that new residential development within the settlement boundary of Malvern meets certain criteria including: sustainable location and design, tenure, scale and design, infrastructure and utilities network, and vehicular and non-vehicular access arrangements. Proposals for further new residential development beyond the existing settlement boundary of Malvern will be resisted unless it can be demonstrated that the proposal meets the requirements of national planning policy relating to new housing in the countryside.

MH3: Infill Development Restraint – this policy seeks to restrict the development of residential gardens or land within the curtilage of previously developed land that has, through time, blended into the landscape. An exception to this may be where the proposed development enables and secures the long-term future of a heritage asset with limited impact on the character of the area.



Employment

ME1: Protecting Employment Land Allocations – this policy seeks to protect the employment land allocations at North East Malvern and Malvern Technology Centre (QinetiQ) for employment development. Development for employment uses must be brought forward in a phased manner along with residential development on these sites. Proposals that reduce the employment land allocated on the sites will not be supported.

ME2: Provision of Small-Scale Employment Development – this policy supports, subject to criteria, proposals for new build development and the conversion and/or extension of existing buildings for employment use.

ME3: Existing Industrial Estates – this policy supports, subject to criteria, employment development and redevelopment within existing industrial estates. Development for non-employment uses will only be allowed where it can be demonstrated that the proposal meets certain criteria including demonstrating that the premises or site is no longer commercially viable and that it has been marketed for at least twelve months for that or any other suitable employment use. Proposals for a like-for-like replacement of an existing non-employment established use within one of the industrial estates will be acceptable providing certain criteria are met.

ME4: Spring Lane Industrial Estate – this policy supports proposals to upgrade and/or redevelop parts of the Spring Lane Industrial Estate including: landscape and environmental improvements, enhanced access and safety and security for occupiers and users. There should be no net loss of employment provision as a result of the proposals. In terms of redevelopment, the Town Council would particularly welcome the provision of small-scale employment units to meet the needs for starter and small/micro businesses.



Retail

MR1: Town and District Centres – this policy seeks to ensure that proposals are of an appropriate scale to the Centre (Great Malvern, Malvern Link and Barnard’s Green) and do not have an unacceptable adverse impact on the vitality of the Centre or of the amenities of residents living in or adjacent the Centre.

MR2: Neighbourhood Parades – this policy seeks to maintain shop units in the parades unless it can be demonstrated that the shop is no longer commercially viable, it will not negatively impact on the vitality and viability of the parade, and will not have an unacceptable adverse impact on the amenities of residents living within or adjacent to the parade.



Infrastructure

MI1: Infrastructure and Development – this policy seeks to ensure that new development has the appropriate infrastructure, utilities and services necessary to serve it without causing an unacceptable adverse impact on existing provision and creating a worsening of existing problems. Proposals may require appropriate mitigation measures to reduce any impact. Major developments will be required to provide an Infrastructure Delivery Statement to demonstrate the appropriate phasing of infrastructure provision to coincide with the phased development.

MI2: Infrastructure Provision – this policy seeks to ensure that new development where appropriate will be required to contribute towards the South Worcestershire Community Infrastructure Levy and/or S106 Agreements. A proportion of this funding, in line with the relevant Regulations, will go towards the delivery of projects and initiatives in the Neighbourhood Plan.

MI3: High Quality Communications Infrastructure – this policy supports the development of high-speed superfast broadband (fibre optic). Where planning permission is required, new infrastructure to support telecommunications installations must meet criteria relating to public exposure, design and impact on the character and appearance of the area.



Transport

MT1: Transport and Development – this policy seeks to ensure that all new major development has adequate vehicular access arrangements onto the highway, there is capacity on the highway network, it has adequate vehicular and cycle parking, it can be accessed by public transport, and the design of proposed roads, pavements and cycle routes create a safe and efficient layout for all users including the mobility impaired, pedestrians and cyclists and for emergency service and refuse vehicles.

MT2: Car Parking – this policy seeks to retain land used for car parking within and adjacent to the Centres **will be retained for car parking** in order to support the vitality and viability of the Centres and the town's tourism. Applications for development on land used for car parking will not be permitted unless proposals include provision for replacement parking on an equivalent basis in terms of quantity, quality and accessibility along with the required provision for the proposed development. Proposals to increase the amount of car parking within the Centres will be supported provided they meet certain criteria.

MT3: Sustainable Transport Routes – this policy seeks to provide new Sustainable Transport Routes (STR) and protect, improve and extend existing routes. New major development will make provision for safe and efficient STRs as part of the proposals. New major development, within close proximity of a STR, that has the potential to result in a significant increase in its usage, may be required to provide appropriate mitigation measures to ensure the long term viability of the Route.

MT4: Great Malvern Railway Station Opportunity Area – this policy supports proposals for a car park adjacent to the station and puts forward criteria that these proposals should be assessed against including being appropriate to the Grade II listed station and the Conservation Area.

MT5: Malvern Link Railway Station Opportunity Area – this policy supports proposals for a park and ride car park adjacent to the station and puts forward criteria that these proposals should be assessed against including having adequate vehicular access arrangements onto the highway and it provides a safe and efficient layout for all car park users, including motorists, pedestrians and cyclists, with a dedicated pedestrian route to the railway station.

Green Infrastructure

MG1: Local Green Spaces – this policy seeks to protect sites designated as Local Green Spaces (LGS) within the Plan unless it is considered appropriate to its or there are very special circumstances that demonstrate that the harm to the Local Green Spaces is clearly outweighed by other considerations. The proposed LGS sites are: Malvern Vale Community Centre playing field, Lower Howsell Road Recreation Ground, Victoria Park, Dukes Meadow, Hayslan Fields and Priory Park.

MG2: Neighbourhood Green Spaces – this policy seeks to protect sites designated as Neighbourhood Green Spaces subject to certain criteria such as: it can be demonstrated there is a surplus of green space provision in the area and the recreational function of the site is retained on site or provided off-site and is of an equivalent or better provision in terms of quantity and quality and is in an equivalent or better location relative to the existing site.

MG3: Key Views and Vistas – this policy seeks to ensure that all new development should protect and/or enhance key views, vistas and gateways that are considered important to the setting and character of the area.

MG4: Woodland, Trees and Hedgerows – this policy seeks to ensure the protection of woodlands, trees of local significance or significant lengths of mature and biodiversity-rich hedgerows from development unless adequate compensatory measures are put in place which will result in a net gain to the overall quality of the environment. Trees not to be retained as a result of the development are to be replaced on a two-for-one basis and hedgerows on a like-for-like basis.

MG5: Landscape Character – this policy seeks to ensure that development proposals outside the settlement boundary consider local landscape character and that any adverse impacts are appropriately mitigated for.

MG6: Neighbourhood Conservation Assets – this policy seeks to protect Neighbourhood Nature Conservation Sites from development and that all new development must be designed to enhance biodiversity/geodiversity interest either on the site or on a designated site including Neighbourhood Nature Conservation Asset sites.

Heritage

MHE1: Non-Designated Heritage Assets – this policy seeks to protect buildings and structures that are identified as having an important local historic or architectural significance. The Town Council will assist the community in nominating buildings and structures to MHDC for inclusion on the ‘Local List’ which signifies their importance locally.

MHE2: Neighbourhood Heritage Areas – this policy seeks to protect the special local architectural and historic interest of identified Neighbourhood Heritage Areas and ensure new development within them makes a positive contribution to its local character and distinctiveness.



Community

MC1: Community Infrastructure – this policy seeks to ensure new residential development will provide appropriate and proportionate new facilities and infrastructure. In addition it seeks to prevent the loss of important and valued facilities for the local community unless it can be demonstrated that it is no longer commercially viable and that the premises have been marketed for at least 12 months for that or any other suitable community use.

MC2: Healthy Communities - Proposals for new residential development of 10 or more dwellings must demonstrate that there is sufficient capacity within GP and Dental services within the catchment area and how it provides opportunities to improve health and wellbeing for the future occupiers of the development.



Design

MD1: Development and Design Principles – this policy seeks to ensure that all development achieves high-quality and inclusive design and integrates into the existing area in terms of landscape, character, design and density by meeting a number of design related criteria. This policy is supported by a Heritage Character Assessment. A Design & Access Statement must address the design criteria requirements and explain the design approach.

MD2: Development and Accessibility Principles – this policy seeks to ensure that proposals provide an inclusive and accessible environment by meeting a number of relevant criteria including the provision of pavements with an appropriate width and surface treatment including tactile paving where necessary and dropped kerbs suitable for all pedestrian users including the mobility impaired.

MD3: Detailed Design Elements - proposals must, where appropriate, consider the following in the design process and integrate them into the overall scheme: bin stores and recycling facilities, cycle storage, street and other external lighting, flues and ventilation ducts, gutter and pipework, meter boxes, satellite dishes, cable and telephone lines, CCTV and permeable paving.

MD4: Microgeneration - proposals for microgeneration schemes including those on dwellings and other small-scale buildings will be supported providing it does not in itself or cumulatively have an unacceptable or adverse impact on the character of the local area; and it does not in itself or cumulatively have an unacceptable adverse impact on the amenity of neighbouring residents and occupiers.



Projects

The Town Council has identified a range of projects that will help to make the area a more sustainable place to live, work and visit. These projects will in part be delivered through policies within the MNP.

The Town Council will lobby for feasibility studies to be carried out on key infrastructure and development that are considered to be extremely beneficial to the local community. These studies include:

Transport

- **Rail Halt at North East Malvern**
- **Transport Interchange including a park & ride site at Malvern Link rail station**
- **Car park site at Great Malvern rail station**
- **Greenways along commons and other routes for cyclists and pedestrians**
- **Off-road route to the Three Counties Agricultural Showground**
- **Support of the widening of Carrington Bridge as a key part of the strategic road infrastructure that provides access to and from the motorway network**
- **A ring road around the east of the town and across the north of the town**

Design and Public Realm

- **Public realm improvements at Malvern link and Barnard's Green**
- **Provision of a Town Square/Focal Point in Great Malvern**

Green Spaces

- **Provision of a basketball/Multi-use Games Area (MUGA) and other enhanced facilities at Victoria Park**
- **Transfer ownership of Belle Vue Island and Rose Bank Gardens to MTC**
- **Options for the former allotments site on Elgar Avenue**
- **Provision of allotments and a local nature area off Guarlford Road**

Community

- **Proposal for a Science and Technology museum showcasing radar/technology/defence and water cure**

- Options for the former Malvern Old Hospital
- Redevelopment of the Post Office Sorting Office in Malvern Town Centre
- MTC to lease or purchase the Tourist Information Centre within Malvern Town Centre

Local Heritage Assets

The Town Council will seek to work with key stakeholders to nominate buildings and structures to MHDC for local listing as non-designated heritage assets.

Neighbourhood Design Review Panel

On larger scale applications (of 10 dwellings or more over 1,000sqm for non-residential development), applicants may be requested to present their proposals to a Neighbourhood Design Review Panel set up by the Town Council.

Friends of Parks Groups for Key Green Spaces

The Town Council will work with local communities and key stakeholders to set up Friends of Parks Groups for Key Green Spaces within the NPA. The priority will be those green spaces identified as Local Green Space within the MNP.

Crematorium

MTC will discuss with key stakeholders the possibility of providing a crematorium within Malvern. This will look at need and land requirements along with potential locations.



Next Steps

A full and detailed version of the Draft Neighbourhood Plan can be found at malvernsfuture.org along with some of the evidence base that supports the draft plan.

The Town Council will consider any comments received on the draft plan and where possible make any necessary changes to it. Following this the next steps will be:

- **6 week formal statutory and public consultation on the draft plan**
- **Review and re-draft of the plan following consultation responses**
- **Submission of the plan to MHDC and statutory 6 week consultation by MHDC**
- **Independent examination and**
- **Referendum and adoption**



Malvern's Future - Neighbourhood Plan questionnaire

Please tick whether you agree, disagree or neither agree nor disagree with each policy.

Housing

Agree

Neither

Disagree

MH1: Housing Mix

MH2: New Residential Development

MH3: Infill Development Restraint

Comments on housing policies

Employment

Agree

Neither

Disagree

ME1: Protecting Employment Land Allocations

ME2: Provision of Small-Scale Employment Devel.

ME3: Existing Industrial Estates

ME4: Spring Lane Industrial Estate

Comments on employment policies

Design

Agree

Neither

Disagree

MD1: Development and Design Principles

MD2: Development and Accessibility Principles

MD3: Detailed Design Elements

MD4: Microgeneration

Comments on design policies

Malvern's Future - Neighbourhood Plan questionnaire

Please tick whether you agree, disagree or neither agree nor disagree with each policy.

Infrastructure

Agree

Neither

Disagree

MI1: Infrastructure and Development

MI2: Infrastructure Provision

MI3: High Quality Communications Infrastructure

Comments on infrastructure policies

Transport

Agree

Neither

Disagree

MT1: Transport and Development

MT2: Car Parking

MT3: Sustainable Transport Routes

MT4: Great Malvern Railway Station Opp. Area

MT5: Malvern Link Railway Station Opp. Area

Comments on transport policies

Heritage

Agree

Neither

Disagree

MHE1: Non-Designated Heritage Assets

MHE2: Neighbourhood Heritage Areas

Comments on heritage policies

Malvern's Future - Neighbourhood Plan questionnaire

Please tick whether you agree, disagree or neither agree nor disagree with each policy.

<u>Retail</u>	Agree	Neither	Disagree
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MR1: Town and District Centres

MR2: Neighbourhood Parades

Comments on retail policies

<u>Green infrastructure</u>	Agree	Neither	Disagree
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MG1: Local Green Space

MG2: Neighbourhood Green Space

MG3: Key Views and Vistas

MG4: Woodland, Trees and Hedgerows

MG5: Landscape Character

MG6: Neighbourhood Conservation Assets

Comments on green infrastructure policies

<u>Community</u>	Agree	Neither	Disagree
------------------	-------	---------	----------

MC1: Community Infrastructure

MC2: Healthy Communities

Comments on community policies

Your details

Name

Address

Email *

* I would like to receive email updates about the Neighbourhood Plan (all information collected will be held confidentially by Malvern Town Council in accordance with the Data Protection Act 1998)

Age group (please tick)

18-25

26-35

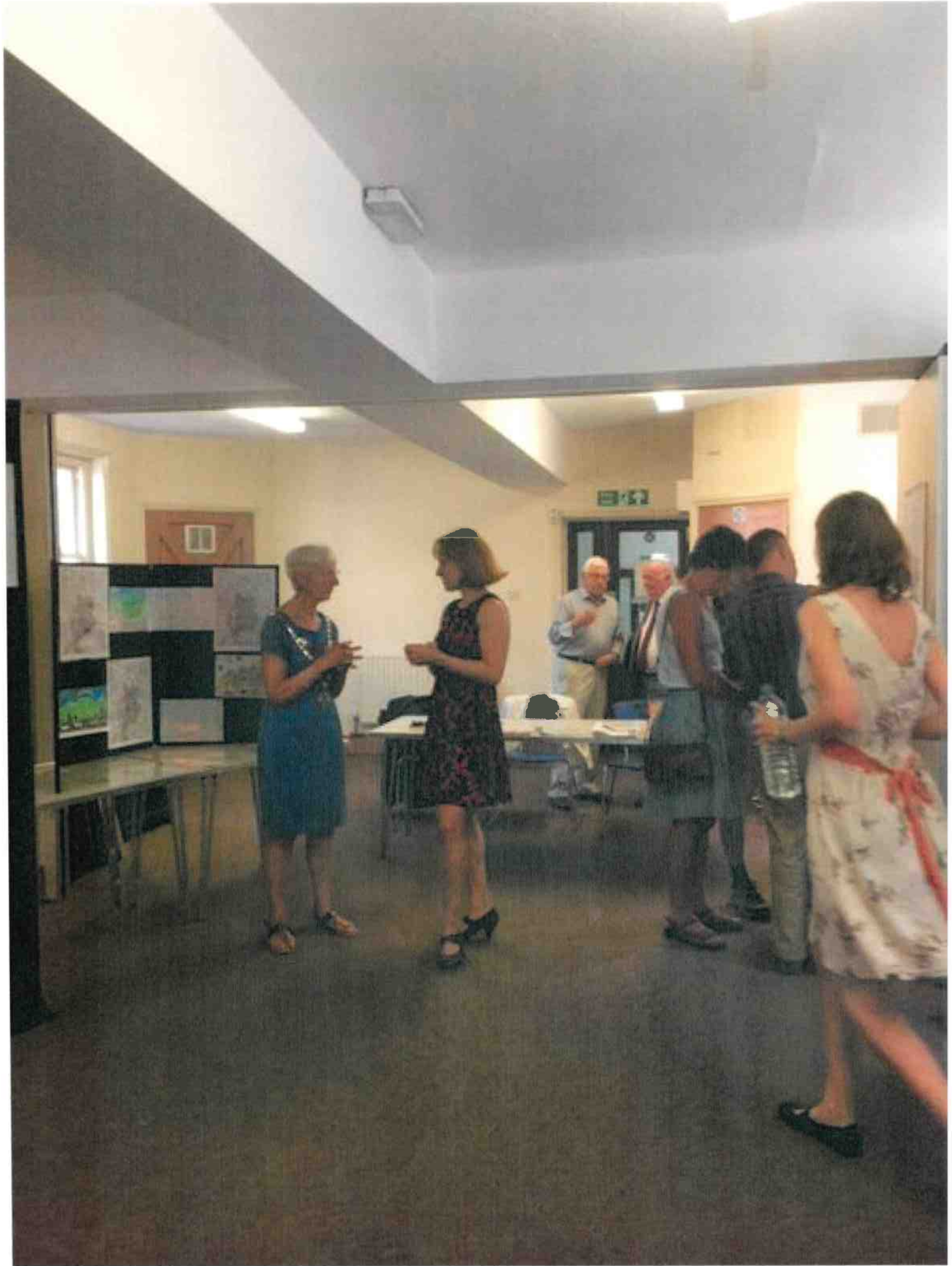
36-45

46-55

56-65

65+

If you have any further comments on individual or all policies, please use continuation sheet provided.







PRE1

Comment	Response	Action
<p>Comments on transport policy's It is sad (probably because it is outside of the 'Malvern Boundary' that no consideration has been given to a second or third access to the A449 from the new housing site to the NW of the town. I fear people have not been considered enough.</p>	<p>The Malvern NP can only deal with land use issues within the Neighbourhood Plan Area (i.e. the Malvern Town Council boundary area). Any potential additional access onto the A449 is only likely to be located on land outside of the NPA. MTC have lobbied vigorously for there to be more than one access point to the site during the SWDP process and as part of representations to the current planning application. In addition MTC have also argued for other forms of transport and access to be provided including a rail halt. This has been included within the 'projects' section of the MNP. One of the key objectives of the MNP is that new development helps to provide a sustainable and beneficial change to the environment and communities within the NPA. The MNP has been informed by responses from previous consultation and engagement and has where possible integrated the wishes of residents and others into policies and proposals.</p>	<p>The MNP could include within the 'Projects' section under 'Transport', working with stakeholders including Welland Parish Council for additional access roads to be provided for the NE Malvern development.</p>
<p>General Seems to me that no consideration has been given to 'Human' access across the A449 at Newland, following the plans to develop the site behind the Swan Public House. Getting across that road at the moment is 'life-threatening' but with vehicles from 700+ houses proposed in the new site using the A449 will make getting across the road nigh on impossible.</p>	<p>Again, this is outside of the NPA and therefore the remit of the MNP. The previous comments in relation to MTC's lobbying on transport matters relating to the NE Malvern development apply.</p>	<p>The MNP could include within the 'Projects' section under 'Transport', working with Worcestershire County Council as the Highways Authority, Newland Parish Council and local residents for the provision of a pelican / toucan crossing at an appropriate location across the A449.</p>

PRE2 – No Comments

PRE3

Comment	Response	Action
<p>Housing Housing policy dictated by the SWDP. Town (parish) council may identify potential areas for development. Infill is no longer permitted under national guidelines.</p>	<p>Housing policy in the form of strategic housing allocations to meet the objectively assessed housing need is set within the SWDP. NP can identify additional sites if the Qualifying Body (MTC) wishes. However, the MNP does not seek to do this as the existing commitments within the SWDP more than meet the identified need. NPPF does not restrict infill development. It states at para 53 that LPAs should consider the case for setting out policies to resist inappropriate development of residential gardens. The MNP includes a policy relating to restricting infill development in certain areas of the NPA.</p>	<p>No change required.</p>
<p>Employment District & County council areas of responsibility Parish may comment, but are unlikely to influence district council or national vision.</p>	<p>The neighbourhood planning process allows for locally specific policies relating to all land use types (with the exception of minerals and waste). As with housing the strategic employment allocations are set within the SWDP. However, additional allocations could be made within a NP. In addition a NP could include policies relating to the protection and enhancement of employment sites. This is taken up within the MNP. The vision, objectives, strategy and policies within the MNP are considered to conform with the national vision for sustainable economic growth.</p>	<p>No change required.</p>
<p>Transport MT2 Car Parking – unless you produce a multi storey car park no additional space.</p>	<p>MT2 – the provision and availability of car parking is considered essential to the vitality and viability of the NPA’s town and district centres. This is</p>	<p>No change required.</p>

<p>MT4 Great Malvern Railway Station opportunity area – land owned by network rail.</p> <p>MT5 Malvern Link Railway Station opportunity area – land owned by network rail.</p> <p>Bus routes have to be commercially viable.</p>	<p>particularly important in relation to these centres competing with Malvern Shopping Park. The policy seeks to protect the existing car parking provision. A multi-storey car park could be a solution should an existing car park be under threat from development.</p> <p>MT4/5 – it is acknowledged that the delivery of this policy will be dependent on the willingness of the landowner.</p> <p>The issue of the viability of bus service provision is not a land use planning matter. The MNP seeks to ensure that new development can be accessible to public transport services.</p>	
<p>The parish has got carried away with areas that are not within its remit. So much, i.e. town square, community hospital, redevelopment of post office sorting facility, have been thrown into the mix for years by Mr Roger Sutton and High Street Malvern Ltd.</p>	<p>The list of projects identified within the MNP has resulted from engagement and consultation with the community. Some of these have been muted for many years. However, MTC has not in the past been a position of producing a statutory planning document that will have to be taken account of for future planning decisions. Although the list or projects don't form policies their inclusion within the MNP will provide some weight to MTC's lobbying of other organisations to try and make things happen.</p>	<p>No change required.</p>

Comment	Response	Action
<p>Housing</p> <p>Take care that the provision of large-scale retirement accommodation does not swamp the residential character of Malvern. Ensure that housing is available for less prosperous families and young people.</p>	<p>MTC have, through Locality technical support, had a Housing Needs Assessment Report produced. This provides an evidenced base assessment of the type of housing needed within the NPA. This document indicates that retirement housing along with extra care housing is required as is family housing. The document should be used by applicants submitting housing development to demonstrate they are providing housing to meet need. It should also be used by the LPA in their assessment of whether the proposed housing is satisfying the identified need.</p>	<p>No change.</p>
<p>Design</p> <p>Try to ensure that new housing schemes are attractive and varied – not just “routine” developers’ planning. The wonderful mix of housing and green spaces should be maintained. Try to enforce good workmanship and sound design principles. What will new buildings look like in a hundred years?</p>	<p>MTC have, through Locality technical support, commissioned a Heritage Character Assessment. This report provides an evidenced based assessment of the character of the NPA including the local vernacular. This document supports the ‘Design’ policies within the MNP wish seek to promote development that responds to and reflects the positive attributes of the NPA.</p>	<p>No change.</p>
<p>Transport</p> <p>Car parking in Malvern needs imaginative solutions. North and east Malvern <u>badly need</u> new road routes. Our railway stations are wonderful assets; they must be maintained (and improved) to a high standard.</p>	<p>The MNP contains a policy that seeks to ensure the retention and enhancement of car parking within the NPA’s retail centres. The MNP also includes policies to provide more car parking at the railway stations to increase passenger use. The MNP also includes a list of projects that the MTC will lobby for including feasibility studies for new road corridors to the north and east of the town. The maintenance of the railways stations</p>	<p>No change.</p>

<p>Heritage</p> <p>Both policies are very important if Malvern is going to continue to prosper. Our tourist industry is very important and needs to be developed much further (e.g. regular tourist events linked in with our heritage).</p>	<p>are the responsibility of Network Rail.</p> <p>Noted. The tourism industry and visitor economy is extremely important for the town and its businesses and residents. The issue of more frequent and regular events is not a land use planning matter and would need to be addressed beyond the MNP. However, the MNP has policies to protect the NPA's heritage and also projects that seek to look at the feasibility of providing facilities and infrastructure that would support tourism and additional events.</p>	<p>No change.</p>
<p>Retail</p> <p>Malvern Link retail centre needs to be rescued from decline with some money and imaginative thinking. What can be done to stop the remorseless development of the Morrison's Shopping Centre? It is sucking our life away.</p>	<p>The MNP recognises the problems associated with Malvern Link. It highlights a need for public realm improvements within the retail area and includes this in the list of projects in Section 7. There are existing planning policies within NPPF and SWDP that would relate to additional out of town retail development. It was considered that there was no more that the MNP could do in this regard.</p>	<p>No change.</p>
<p>Green Infrastructure</p> <p>Our green spaces are very important and must be protected from any development. Trees are also very important to the character of the town but with hundreds of Victorian trees achieving their maturity, should we be quite so obsessive about maintaining every one of them?</p>	<p>The MNP looks to designate the most special green spaces as Local Green Spaces which would receive a high level of policy protection. Other greenspaces are also protected through a Neighbourhood Green Space designation. In addition the Commons and associated land also is afforded special protection. The MNP includes a policy seeking to protect important trees and hedgerows and additional planting where trees are lost. The issue of maintaining the stock of trees in the area as trees</p>	<p>The MNP could include within the list of projects the need to carry out a survey of the existing stock of trees and the likely longevity of trees along with proposals for planting new trees to help maintain the stock into the future. This will assist with maintaining the character of the area and will provide important climate change mitigation measures as part of the NPA's Green Infrastructure.</p>

	<p>mature and start to die is important in the context of maintaining the character of the area. This could be reflected in the MNP although there may need to be some evidence collected about the age and longevity of the existing stock.</p>	
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PRES

Comment	Response	Action
<p>Housing MH1</p> <p>Principle acceptable, but concerned with regards to how realistic this requirement is. Too bureaucratic. If the town has specific need the emphasis should be on the council to set out the housing mix requirement.</p>	<p>National Government guidance allows for neighbourhood plans to assess the type of housing need (done in this case through the Housing Needs Assessment) and to have policies that require future housing development to provide housing to meet that need. Local Planning Authorities do assess housing need. However, this is often related to affordable (social) housing only or is often related to the whole borough/district area. As such it doesn't provide the finer level of detail required for the NPA.</p>	<p>No change.</p>
<p>Green Infrastructure</p> <p>MG5 – why only outside settlement boundary? Landscape character and G.I. relevant inside boundary too.</p> <p>MG4 – two for one tree too prescriptive and not correlated to the aims of the policy.</p>	<p>Policy MG5 looks at proposals on the edge of the settlement where the urban environment meets the countryside as it is considered that the landscape impacts here could be significant. Other policies in relation to design, greenspace, nature conservation and heritage seek to deal with landscape character and GI within the settlement boundary. Agreed, we will look to amend Policy MG4 to remove the prescriptiveness of it.</p>	<p>Amend policy MG4 to provide replacement on a like-for-like basis.</p>
<p>Community</p> <p>MC2 – too bureaucratic. Not realistic/pragmatic to require developers of 10 units to provide this information.</p>	<p>With NHS resources stretched to capacity and beyond in many areas it is considered that there is a need to make sure that new housing development does not make this situation worse. Health infrastructure is as important as education infrastructure and housing developments of all sizes are assessed to see what the impact of the new residents will be on school places. The same principle is being applied here in relation to</p>	<p>No change.</p>

	<p>primary care facilities. The information is available from the local NHS Health Trust or CCG and should not create significant additional work for applicants as part of their submission.</p>	
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PRE6

Comment	Response	Action
<p>Retail Allow pubs, shops that are not viable to be used for housing.</p>	<p>The MNP allows for pubs (as a community facility) to be used or developed for other uses provided it can be demonstrated that it has been marketed for 12 months without interest. This helps to demonstrate whether it is viable or not. The MNP also seeks to protect shops in designated neighbourhood parades unless again it can be demonstrated that there has been no interest for this use following a 12 month marketing exercise. The SWDP and the MNP also seeks to protect shops within primary shopping areas of the town and district centres.</p> <p>Under certain circumstances shops can be used for housing without the need for planning permission (Class M, Part 3, Schedule 2, The Town and Country Planning (General Permitted Development) (England) Order 2015).</p>	<p>No change.</p>

Comment	Response	Action
<p>Transport</p> <p>Ensure adequate provision is made for future transport needs, including new residential and commercial development. Recognition of need for by-pass.</p>	<p>The MNP includes a number of policies relating to transport and MT1 deals specifically with new development and transport requirements. The issue of new roads to the east and north of the town are included in the list of feasibility studies that MTC will lobby the relevant authorities for.</p>	<p>No change.</p>
<p>Heritage</p> <p>Designation of more localities as conservation areas. Encourage MHDC to facilitate 'Local Listing' process – overly bureaucratic process at present.</p>	<p>The designation of Conservation Areas can only be made by the Local Planning Authority. MTC, amenity groups and residents could lobby MHDC and provide appropriate evidence for the designation of additional or extensions to existing Conservation Areas.</p> <p>The MNP includes a proposal to designate Neighbourhood Heritage Areas and a policy that supports the protection of the historic and/or architectural interest of these areas.</p> <p>It would be useful to know if this representor has specific areas in mind.</p> <p>MTC has 'nominated' a number of buildings and structures for local listing to MHDC. This is the start of what is considered an ongoing process. MTC will continue to liaise with MHDC on this.</p> <p>Any change to the local listing process will be up to MHDC.</p>	<p>No change.</p>

PRE8

Comment	Response	Action
<p>Housing Design parameters important.</p>	<p>Sustainable design is one of the criteria within policy MH2 to assess residential applications. The MNP also includes design policies that would be used to assess the design of housing and other development within the NPA.</p>	<p>No change.</p>
<p>Employment Employment land allocation must be vigorously protected. Employment land allocated at Malvern Vale was lost!</p>	<p>The MNP includes Policy ME1 that specifically seeks to protect the employment land allocations within NE Malvern and QinetiQ. There is also Policy ME3 that seeks to protect existing employment areas for continued employment use unless certain conditions can be demonstrated.</p>	<p>No change.</p>
<p>Design In addition new housing should be encouraged to promote/support micro/solar generation.</p>	<p>This is included within Policy MD4 Microgeneration.</p>	<p>No change.</p>
<p>Infrastructure All very important.</p>	<p>Noted</p>	<p>No change.</p>
<p>Transport Doubt whether land exists at Great Malvern Station unless the 'nest'.</p>	<p>Not sure what or where the nest is. The land subject of this policy is a strip of land south of the station on the western side of the railway line.</p>	<p>No change.</p>
<p>Heritage Local listing needs pushing.</p>	<p>Agreed. MTC has started the process by 'nominating' an initial list of buildings and structures. MTC will continue to liaise with MHDC to conclude the process for this initial list.</p>	<p>No change.</p>
<p>Retail Need to be realistic on retail. Online purchases are driving changes.</p>	<p>The MNP accepts that shopping behaviours are changing with more sales happening online. As such the MNP Policy MR1 recognises that the centres are also places for social, cultural and</p>	<p>No change.</p>

	leisure opportunities and allows for these types of uses at a scale appropriate to the centre.	
Green Infrastructure MG1 MG1 – Adam Lea should be included as local green space.	We would need to demonstrate with appropriate evidence why this should be designated as LGS.	Evidence to demonstrate the LGS designation needed.

PRE9

Comment	Response	Action
<p>Housing Affordable housing – as much as possible within government restraints.</p>	<p>The MNP defers to the SWDP in relation to the provision of affordable housing in association with new development. The Housing Needs Assessment reaffirms the need for affordable housing within the NPA.</p>	<p>No change.</p>
<p>Employment If some residential development of non-executive houses might it be possible for workers to live closer to the place of employment?</p>	<p>The Housing Needs Assessment provides an evidence base for the type of housing required in the NPA. There is a need to ensure the delivery of housing to ensure that people who work in Malvern can also live in the town if they wish to.</p>	<p>No change.</p>
<p>Design MD1 – does High Quality mean 5-bed exec homes or can it include environmentally friendly little houses/flats? MD4 – Great if national policy allows it!</p>	<p>Quality in this context relates to the design and aesthetics of the development and not the house type. Due to current government policy the MNP cannot stipulate a requirement for microgeneration. However, this policy provides some criteria to protect amenity should microgeneration proposals come forward.</p>	<p>No change.</p>
<p>Transport MT1 – nice for buses to be able to access developments in case policy changes so that services can be improved. MT3 - sustainable transport routes – I hope that means cycling and potential for buses. Look at whether footpaths could help pedestrians in particular to take short cuts.</p>	<p>Criteria 5 of Policy MT1 seeks to do this. Policy MT3 is specifically looking at off road cycling and walking routes as a means of providing safer provision and increasing non-vehicular modes of transport within the town.</p>	<p>No change.</p>

PRE10

Comment	Response	Action
<p>Housing New housing will have a design life of many decades. Should we be insisting that developers include solar PC panels, or at least solar water heating, on all new build? A role for the Neighbourhood Design Review Panel?</p>	<p>The MNP has to conform to national policy. At the present time there is no stipulation at a national level for the provision of solar PC panels or other microgeneration schemes. A policy that demanded this provision would unfortunately not meet the basic conditions. The relevant criteria 'Sustainability and Energy Performance' within SWDP Policy 21 'Design' was deleted for this reason.</p>	<p>No change.</p>
<p>Employment This is a plan; an ambition. To avoid sounding half-hearted, I suggest that it should be stated clearly and directly without repeated references to "criteria".</p>	<p>The 'criteria' provide some measures or indicators for the decision taker to use to assess and ultimately determine whether the proposal satisfies the policy objective(s).</p>	<p>No change.</p>
<p>Design See my previous comment: there are far too many caveats. It would be better to read; "for example, including the provision of pavements ... etc."</p>	<p>As above.</p>	<p>No change.</p>
<p>Infrastructure The Plan and implementation issues are separate. For example, 'high quality comms', the plan is to support high speed superfast broadband. The remainder of that paragraph is an implementation issue and should not be part of The Plan.</p>	<p>Disagree. The second part of the policy provides criteria / conditions that need to be met for any proposal to provide telecommunications where planning permission is required (many telecommunication installations have permitted development rights). It is not the implementation but the conditions upon which any proposal will be judged.</p>	<p>No change.</p>

<p>Transport</p> <p>Steps to ease congestion on the A449 between Malvern and Worcester should be a priority. Park and Ride at both stations and engagement with rail franchise holders should aim to encourage use of public transport. A 'Newland Halt' on the railway could serve new housing in the area and avoid further traffic on the A449.</p>	<p>These are all identified within the list of projects that MTC will lobby the relevant authorities on. The MNP includes a policy supporting the provision of additional parking at the Great Malvern station and a park and ride site at Malvern Link station.</p>	<p>No change.</p>
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PRE11

Comment	Response	Action
<p>Housing Agree with the policies – encouraging small developments within town boundaries especially on brownfield sites is good, providing sensible criteria are met. The large development at Newland is needed and on the right side of town to allow for access to Worcester and the motorway network.</p>	Noted.	No change.
<p>Employment Agree with the policies – with the influx of residents forecast in the SWDP there is a need to encourage additional employment which provides opportunity for the prosperity of our town.</p>	Noted.	No change.
<p>Design Agree with the intention – the addition of inappropriate features can heavily detract from the character of a place or building. The proposal to supply landfill bins for fortnightly collection may create a problem disfiguring the appearance of some areas. Advice on how to mitigate this would be a welcome service. This links in to housing policies – for example some of the new houses in North Site already have an aesthetic issue with refuse containers. We certainly need more green generation, but care needs to be taken in balancing this need against the aesthetics. I am encouraged this is highlighted in the policy</p>	Noted.	No change.

<p>Infrastructure</p> <p>The SWDP calls for a significant rise in the population of Malvern and district. It is essential that our existing infrastructure is not overwhelmed. This policies talk of S106 contributions from developers to meet these needs which is good. The provision should be met however as forecast, not in retrospective identification.</p>	<p>The last sentence of Policy MI1 attempts to deal with the provision of infrastructure to coincide with the development.</p>	<p>No change.</p>
<p>Transport</p> <p>This is key to the future of our town. We know there are issues accessing and leaving Malvern which will get worse with the forecast population increase, not only in our town but from the developments in the wider area such as those in Kempsey etc. Whilst not strictly in the remit of the Neighbourhood Plan the Town and District Councils should continue their efforts to influence the correct transport vision. The Park and Ride proposals at the railways stations are a very good idea and should be expanded in conjunction with bus companies to provide “hubs” for wider transport facilities for visitors and residents alike. A bus to take passengers to central Malvern, the Hills or surrounding villages would be very useful if co-ordinated properly, especially to cater for special events.</p>	<p>Noted. The MNP could include the provision of transport ‘hubs’ at the two railways stations within the list of projects.</p>	<p>Add the provision of transport ‘hubs’ at the two railways stations within the list of projects within Section 7 of the MNP.</p>
<p>Heritage</p> <p>Malvern has a wonderful history and the evidence</p>	<p>Noted. The provision a local ‘Green Plaque’ scheme could be included within the list of</p>	<p>Add the provision a local ‘Green Plaque’ scheme within the list of projects in Section 7 of the MNP.</p>

<p>needs to be both protected and enhanced. The Civic Society is active and should enjoy continued support. These policies need to be actively pursued in conjunction with MHDC. A suggestion might be a local "Green Plaque" scheme which gives details of the history on sites of note raising awareness. We already have some but maybe making it a policy might widen the use.</p>	<p>projects within the MNP.</p>	
<p>Retail</p> <p>We feel that Malvern Town is lacking in a good range of shops – there are too many charity outlets and new ventures seem to fail indicating perhaps that costs are inappropriate? Can the town attract more new ventures with say beneficial rates for the start-up period or other incentives involving the landlords? With the attraction of the Hills we should have a more vibrant tourist scene than it appears we have. Perhaps a weekly market similar to the one we used to have on the site of what is now the Waitrose car park. The Belle Vue Terrace closure to permit a celebration event is a good opportunity too, encouraging visitors who then use the retail outlets.</p>	<p>The issue of rates, etc. is out with the remit of the MNP and would need to be taken up with MHDC separately.</p> <p>The MNP identifies the need for a focal point within Great Malvern for events. It includes within the list of projects in Section 7 the provision of a town square/focal point in Great Malvern. MTC will use this to lobby the relevant organisations to try to bring this forward.</p>	<p>No change.</p>
<p>Green Infrastructure</p> <p>Agree with the policies as they align with the SWDP and protect the places that provide amenities for health and well-being of the community. Malvern has a reputation for being a</p>	<p>Noted.</p>	<p>No change.</p>

<p>green and pleasant place both on the Hills and the area surrounding them. These policies should help to protect the reasons for that reputation.</p>		
<p>Community Agree with the policies especially the requirement to demonstrate capacity for essential community services for new developments. Whilst the NPPF requirements cover this to some extent a local focus on such service provisions will help the planning process and might require more detailed evidence. The examination of existing facilities in danger of closure and their impact on the community is an essential means of protecting the infrastructure – commercial interests do not necessarily align with the community’s needs</p>	<p>Noted.</p>	<p>No change.</p>
<p>General Comments The management of the town is we believe good with excellent recycling facilities and a very high standard of maintenance of parks and open spaces. Parking and transport are areas of concern for the future with the influx of a higher population in and around Malvern. In particular the proposal to widen the Carrington Bridge is very necessary but linking it to the road system already being constructed needs thinking through thoroughly. Worcestershire Highways department has a poor record in this area and needs encouragement to do better. Church Street congestion is a problem that is likely to get worse. The issue being mainly caused by delivery vehicles</p>	<p>Some of these suggestions are included within the MNP at Section 7 under the list of projects. Those that aren’t could also be added such as:</p> <ul style="list-style-type: none"> • Ban deliveries during peak periods on certain roads. • Close and utilise Church Street and Belle Vue Terrace for monthly events. 	<p>Add the ban deliveries during peak periods on certain roads and closure of Church Street and Belle Vue Terrace for monthly events within the list of projects within Section 7 of the MNP.</p>

parking inconsiderately. Perhaps a ban on deliveries between peak hours would help. Existing tourism facilities such as the Bands in the Park and Outdoor Cinemas are well attended and popular. The Christmas lights and festivities are relatively new to Malvern but are hugely successful. Easter Egg races run in conjunction with the Rotary Club show the possibilities for a vibrant town centre life. Partnerships coordinated by MTC bringing together influential bodies to organise events together may generate benefits to all. Future projects of this kind could include trips to the Hills via horse and cart if not conventional transport (Conservators Trust permitting), and a bus service linking the 3 centres of Great Malvern, Malvern Link and Barnards Green, including Park and Rise hubs. The various markets in the Priory Churchyard and Abbey Road are good but need further work or location enable expansion. Maybe utilise some of the car parks e.g. Grange Road or The Splash car park on a one day a week basis? Or more radically close Church Street or Belle Vue Terrace to traffic for a street market once a month or so dependent on popularity.

PRE12

Comment	Response	Action
<p>Housing</p> <p>Para. 3.69 There seems to be no noun or verb in the first sentence.</p> <p>Para 3.70 What is declining? Provision? Numbers?</p> <p>Para 3.71 What is SHMA? Should we comment here, as well as in para 3.78 that the continued development and expansion of Worcester’s University may affect the comment on student households.</p> <p>Policy MH3 Infill Development Restraint. This is very welcome and I, for one, am grateful for it. I would, however, still not create loopholes and arguing points and would therefore stop at “previously developed land”. If the “through time” exception is unalterable and has to be kept the last sentence should be deleted anyway and the whole of para 6.1.12.</p> <p>Para 6.1.11 – “an” existing “dwelling house”.</p> <p>We should, I feel, say something about the areas of the Town not included in the Infill Development Restraint. I would say that infill will not be permitted here, either, except in locations where a gap has occurred in a sequence of buildings and the closing of that gap would either benefit or at least not damage, the overall appearance of the area. Permission will not be granted for “backland” development – particularly back gardens and similar spaces at the rear of existing properties and particularly if the result is either the construction of a building significantly</p>	<p>Noted.</p> <p>SHMA stands for Strategic Housing Market Assessment which looks on a south Worcestershire basis at the current housing stock and need in the future. Can make reference to the university and student households.</p> <p>MH3: the policy includes these references to comply with national policy. If these are taken out I think the policy would fail the ‘basic conditions’ test.</p> <p>There are other policies within the plan that seek to protect the positive and intrinsic characteristics of the Town. These could be applied to development proposals in the whole of the NPA. I think a blanket ban on ‘backland’ development would fail to meet the ‘basic conditions’ test.</p> <p>The glossary to the NPPF states that residential gardens cannot be classed as previously developed land. This provides some protection from development as applicants cannot argue that the proposal is a ‘brownfield’ site.</p>	<p>Grammar, typos, etc. will be reviewed and amended where appropriate.</p> <p>The change can be made in the draft and we can see what comments come back as a result of the RE 14 consultation or I can keep it as it is. Please advise? No Change</p> <p>The change can be made in the draft and we can see what comments come back as a result of the RE 14 consultation or I can keep it as it is. Please advise? No Change</p>

<p>out of line with adjacent buildings, or involves a consolidation and development of several spaces with (perhaps) the provision of a new access.</p>		
<p>Design Policy MD3 – are we allowed to add an 11th? external access arrangements and design should enable and facilitate access to the building by wheelchairs and/or the disabled or infirm, plus – of course – a ‘why’ paragraph in the reasoned justification Para 7.14 – ditto (twice). Para 7.14 – as I have said earlier, I do not think the Town Council should ‘support’ the Carrington Bridge proposal (or that it has ever decided to do so except by planning osmosis). I would re-phrase this to say the council will support the improvement of the A449 and A4400 as a key part etc.....</p>	<p>Yes, this can be added along with a paragraph in the RJ.</p> <p>Noted. Is it possible to get clarification on where MTC stands on the issue of widening the bridge? Is there any formal resolution? Or should as is being suggested rephrase it so that it refers to improvement of the relevant road corridors but doesn't specifically mention the bridge. An alternative could be that it refers to the improvements along the corridors including the widening of the bridge.</p>	<p>Include element regarding external access arrangements.</p> <p>Amend. Please advise? General Improvement of relevant road corridors.</p>
<p>Infrastructure Policy MI1 This seems to mirror the “new” S.106 limitation by referring to infrastructure “necessary to serve development”. I am much more concerned about the Town wide effect of any development on infrastructure well away from the actual development. This is addressed in (say) para 6.4.2 but the words of MR1 seem to limit this item, perhaps para.2 of the five point list in para. 6.4.3 Should read “in the whole of Malvern Town”.</p>	<p>The test for legal obligations (S106 agreements) (a) necessary to make the development acceptable in planning terms; (b) directly related to the development; and (c) Fairly and reasonably related in scale and kind to the development. This policy seeks to ensure that the provision of the appropriate infrastructure for that development is assessed and provided in a timely manner. It is not a policy to use development proposals to address current inadequacies in</p>	<p>No change to policy MI1.</p>

<p>Para 6.4.4 and the town council will also lobby other authorities probably MHDC to make similar contributions (as in para 6.8.5)</p> <p>Para 6.4.5 after timely manner – add words such as usually before any work on the development is commenced.</p>	<p>infrastructure or utilities. This reference can be added.</p> <p>This reference can be added.</p>	<p>Add reference to para 6.4.4.</p> <p>Add reference to para 6.4.5.</p>
<p>Transport</p> <p>Para 3.79 I do not think it is universally accepted that the Carrington bridge causes congestion or constitutes a major bottleneck. Perhaps the language could be less categoric? One councillor with I believe some career experience argues very cogently against the hugely expensive bridge widening scheme and that the actual problem is the A38 junction roundabout.</p> <p>Para 3.81 I would add two things 1, The location outside Clarence Park of two opposite bus stops and 2, The access and the household waste site.</p> <p>Para 3.82 As well as the comment about local people's view, we should also refer to the SWDP which talks about a through road linking with the adjacent developments- ignoring the issues of individual ownership, so called ransom strips and developers plans based solely on ownership. This is clearly detailed in the relevant appendix as SWDP 56 and yet seems to be ignored by WCC, MHDC and the various developers.</p>	<p>The paragraph could be altered to refer to a number of issues that cause congestion including the bridge and the A38 roundabout.</p> <p>These can be added if this is accepted by MTC.</p> <p>Criteria C. v. of Policy SWDP56 refers to opportunities for connection to and integration with existing and proposed development, for example the Royal Estates and the former allotments site allocation to the south through appropriate road, footpath and cycle links and through opportunities for regeneration. This can be referenced in para 3.82. However, the MNP is referring to people wanting a secondary vehicular access onto the A449.</p>	<p>Amend as suggested in the response.</p> <p>Please advise? Accepted please add</p> <p>A reference to SWDP 56 C. v. can be made within the paragraph.</p>
<p>Para 3.84 Can we please refer to railway stations?</p>	<p>Change rail to railway.</p>	<p>Make change.</p>

<p>(see para 5.9)</p> <p>Para 3.91 Following a discussion I had on the 18th July I wonder whether we should comment on the absence of/hed for/difficulty of provision of cycle routes, and the deterrent effect of rail operators in relation to getting cycles on trains at all, or with great and potential journey aborting, uncertainty.</p> <p>Para 3.93 Incorrect spelling of Barnard's Green.</p> <p>Para 6.5.2 I realise we are 'caught' by the standards referred to in para 6.5.3, but I reiterate my preoccupation that parking standards should recognise the increased size of cars.</p> <p>On a separate point, there was a particular problem referred to in relation to the planned Newland development and that was that there was no recognition – particularly in relation to the space made available for parking – of the number of vehicles that might be associated with a single residential unit (because of such things as a changed and developing ownership of cars, coupled with a decline in public transport), and (because of housing costs) car-owning children returning to live with parents. This trend has, of course, the knock-on effect of parking in the road. I realise it is anecdotal but my neighbour has a garage used for storage and a small drive which just accommodates two cars. There are currently four and sometimes five vehicles using the property. Across the road is a similar situation, but with six or seven vehicles.</p> <p>Para 6.5.4 should we not be mentioning the new strategy being introduced by Waitrose and the</p>	<p>What was the discussion and who was it with? The section on cycling could reference the issues around lack of provision of routes and problems of using trains as a cyclist.</p> <p>Noted. This can be referenced here and at para 3.9.4 'Parking'.</p> <p>Noted. Policy MD2 attempts to deal with this issue.</p> <p>We can mention it but there is not much the MNP can do about the management of a car park by its</p>	<p>Amend.</p> <p>Amend.</p> <p>No change.</p> <p>Please advise how you wish to deal with this? Please ignore this MHDC have confirmed about parking under planning arrangements</p>
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<p>subtle withdrawing of historic parking rights implicit in it. This move by them increases both the pressure on parking and my objection to the potential disappearance of Victoria Road car park in the sole interest of a capital receipt for MHDC. I am therefore very happy with the first sentence in policy MT2 which does seem to affect Victoria Road, but I suspect flogging dead horses is a more apt circumstance.</p> <p>Para 6.5.10 one of the things I picked up at the public event on 18 July was the lack of any kind of overall joined-up thinking by the various authorities. I have already commented on the manifestation of this failure in relation to cycle provision (e.g. on trains). I realise we have to recognise the constraints inherent in our road system (which affects all infrastructure issues) and which, in relation to cycling or bus routes, preclude this sort of provision in the light of the retention of on street parking which is seen as so necessary to our retail trade. Too much on street parking in Malvern is by office workers in the town (like employees of solicitors, estate agents, banks and central heating fixers) but this aspect is probably not appropriate for the Neighbourhood plan. Two other random examples of the lack of across-the-board thinking are the changes to the fire cover (and the flurry or pseudo-commercial speak to justify them) and the fact that the new(fish) hospital is considering reducing the number of beds.</p> <p>Policies MT4 and MT5 it follows from my last comment that I would like to reinforce our</p>	<p>owners. I would have thought that the planning permission for Waitrose would have a plan and a condition regarding the provision of car parking but it wouldn't say how the car park was to be managed and whether or not charges would be made.</p> <p>The Victoria car park is an allocation in the SWDP and is not something the MNP can resist without it as a result failing the 'basic conditions tests'.</p> <p>These issues could be referred to in Section 7. The delivery of them would be out with the MNP.</p>	<p>No change.</p> <p>No change.</p>
	<p>I agree that integrated transport solutions are required to make a real difference to people's</p>	

<p>commitment to non-sectionalised thinking (now, I believe, called atomisation) by somehow presenting these two issues as a single issue requiring an integrated solution rather than as two separate, unconnected, matters. Para 7.8 – ‘railway’ rather than ‘rail’!</p>	<p>travel behaviour. The policies could be combined into one. Change rail to railway.</p>	<p>Please advise how you wish to deal with this? Combine policy’s MT4 and MT5. Amend.</p>
<p>Heritage Para 6.7.1 – should it be ‘scheduled’ (with a ‘d’) and ‘there’ are (with an ‘r’ not an ‘s’)?</p>	<p>Noted and amend.</p>	<p>Amend.</p>
<p>Retail Para 3.52 the term retail centre is a bit confusing, given the definition in para 3.44 where this phrase does not appear. I would substitute here words like “Malvern Link District Centre” or the “linear shopping area of Malvern Link”. Para. 3.59 There is also a parade in Barnards Green, but this is perhaps subsumed into the wider concept that is the Green as a whole. Para 6.3 para 3 the reference is town centre means Great Malvern. The words would work without these two words see para 3.44 Policy MR1 I am still worried about the phrase “town centre” could we somewhere in this section include a reference to the need and requirement is retain and preserve historic and unique shop frontages which give a unique</p>	<p>These are terms that are consistent with national and local planning policies and designations. It is likely that it is located within the district centre. The reader may not read the whole of the document and therefore it is important that the town centre designation of Great Malvern is referenced in the policy section even though it is mentioned in section 3. The term is consistent with national and local planning policies and designations. The MNP could include a policy relating to shop fronts and their design and adverts. Need to check whether the SWDP refers to this and</p>	<p>No change. If there is a policy in the SWDP please reference it. No change. No change. No change. Please advise? Have a policy about preserving historic and unique shop fronts to retain heritage of town.</p>

<p>distinction in particularly, the various retail centres, and also introduce a requirement to avoid a corporate sameness is anywhere in the UK in the design of any new buildings or frontages. Para 7.6 – is the work ‘with’ missing as the sixth word?</p>	<p>whether there is an SPD relating to shopfront design.</p> <p>Noted and amend.</p>	<p>Amend.</p>
<p>Green Infrastructure</p> <p>Policy MG1 I have a dilemma when I think about the building in our own Victoria Park and the restriction on expansion in this policy. I see why the restriction is necessary but (as a property owner with plans) I would not want to inhibit the development of a re-built and perhaps larger Victoria Park café/changing rooms etc. so as to make difficult the construction of a community centre not just limited in use to the use of the park.</p> <p>Policy MG4 – I worry about the opportunities for clever lawyers and pre-programmed planning inspectors which this policy allows – ‘generally’ and ‘unless’ etc. In a way, this illustrates the difficulty of stating a general policy which doesn’t quite work when applied to a particular circumstance (one of which, in Chase Ward, I have very much in mind).</p> <p>Para 6.6.10 – we have had a problem with legal agreements. MHDC have entered into at least one I know about, and have done so on an equal footing and standing alongside the developer and his sub-contractors, not as a local authority with the potential to act against their co-partners. This has led to the consequence of residents in a new</p>	<p>The policy does allow extension/alteration and replacement providing that it meets certain criteria.</p> <p>Delete the word ‘generally’. I consider the ‘unless’ is appropriate as this provides for mitigation which may bring about an enhancement to the area through new tree/hedgerow planting.</p> <p>This is not unusual and is not something that the MNP can influence.</p>	<p>No change.</p> <p>Amend.</p> <p>No change.</p>

<p>development being required to pay – for services which other residents in the town receive from that local authority. This is inherently unfair and any proposal to have a legal agreement should limit the nature of the agreement and require (particularly) MHDC and WCC to behave like a local authority and less like an opportunistic, profit-seeking, cost reducing business.</p>		
<p>Other comments Introduction paras 1.1 and 1.2 I am not sure I would include the phrase “bottom up” when in the very next paragraph we say “the plan must be in conformity with higher level planning policy” The opening sentence makes sense without these two words. Para 1.4 This first reference to the District Council should spell out its whole title, followed by parenthetical (MHDC) which can thereafter be used. Para 1.10 Parenthetically Include the name of the consultants. They deserve the credit for a good job. Para 1.12 First bullet point – is this a correct description of the school I thought it used the word “Perrins” in the title and did not call itself a secondary school Should we now add Tuesday 18 July 2017 Para 1.14 The reference to a referendum assumes a fait accompli of adoption. The town council are not David Cameron! Should words be put in the effect of “if approved by more than 50% of these voting?”</p>	<p>Noted and amend.</p> <p>Noted and amend.</p> <p>This is up to MTC.</p> <p>The correct title is Dyson Perrins Church of England Academy.</p> <p>Yes. Noted and amend.</p>	<p>Amend.</p> <p>Amend.</p> <p>Please advise? We as a Town Council would like to thank everyone who has been involved in producing the Neighbourhood Plan including stakeholders throughout the town, members of the working parties and Peter Hamilton (of Cass Associates)</p> <p>On back</p> <p>Amend.</p>

<p>Para 1.18 I know what the words mean, but local people will not make decisions, but leave certain decisions to be made.</p> <p>Para 3.3 I would say a little bit more to point out that these factors make Malvern a place where people are actively seeking to live and where there is a constant demand for housing. As you know, I think the town is in many such ways uncharacteristic of the rest of the Malvern Hills District and that every and any opportunity should be taken to bang on about this. Maybe para 3.8 is the place to relax more eloquent.</p> <p>Para 3.5 Fourth Line “to which” is a funny phrase. Should it be “after which?”</p> <p>Para 3.31 I found understanding this paragraph just a bit difficult not helped by the number of initials used – albeit in line with earlier references. “GI foxed me till I worked it out and I would have like to have been told what all these categories of ECA are.</p>	<p>Note and amend.</p> <p>Noted and amend.</p> <p>Noted and amend.</p> <p>Noted and amend.</p> <p>A footnote can be added providing a web link to the document.</p>	<p>Amend.</p> <p>Amend.</p> <p>Amend.</p> <p>Amend.</p> <p>Amend.</p> <p>Amend.</p> <p>Amend.</p>
<p>Para 5.3 – is this the place where we could and should emphasise (a desire for) an overall (?holistic) approach to issues instead of looking at (e.g.) one bus route or one railway station in isolation, and doing things to the one-ness which impact on other aspects of the same function e.g. the railway people have ne something involving</p>	<p>Although, I agree with the issues raised the MNP is a land use planning document and can't make organisations that are responsible for the delivery of transport and travel do what is being suggested.</p>	<p>No change.</p>

<p>vehicles at Malvern Link station which has had a significant impact around Great Malvern station, and (as above) they are also doing things very damaging to the use of trains by cyclists. Two decisions affecting three policies taken, it seems, in separate boxes. Similarly, decisions on buses are taken by individual companies on purely, and separate to each, commercial considerations while a benign and acquiescent county council watches on.</p> <p>Para 5.4 – I would stop at “NPA” and delete the “particularly” phrase and also begin the curtailed first sentence to say, “the MNP accepts that proposals for further...”</p> <p>Para 5.5 – I would delete the whole sentence beginning “windfall sites”.</p> <p>Para 5.9 – spelling of “retails”.</p> <p>Para 5.10 – can we add, “and, where appropriate, kept or taken into public authority of MHT occupation or ownership”?</p> <p>Para 5.13 – should it be “scheduled”?</p> <p>Para 6.2.7 – Some words are missing or not enough have been deleted- “supported in ...”</p> <p>Appendix 3.3 – I think the 81 dwellings in Brook Farm Drive have now been approved.</p> <p>Appendix 6.3 – do we mean ‘Native’ sites or ‘Nature’ (heading)? I would certainly wish to nominate some local natives who I think need conserving and have a much longer list of natives I would not wish under any circumstances to conserve!</p> <p>Finis – the simpler, colourful and excellent</p>	<p>Noted and amend.</p> <p>Can there be clarification on the issue of ‘windfall sites’ for MTC please?</p> <p>Noted and amend.</p> <p>Is this acceptable to MTC and MHT?</p> <p>Yes.</p> <p>Delete ‘in’.</p> <p>I will request an update on the information received from MHDC upon which Appendix 3.3 is based and make any necessary amendments.</p> <p>Nature.</p> <p>Noted.</p>	<p>Amend.</p> <p>Please advise? No ignore</p> <p>Amend.</p> <p>Please advise? Town Council agree with this concept but don’t name the body leave general and only if acceptable and feasible.</p> <p>Amend.</p> <p>Amend.</p> <p>Amend.</p> <p>Amend.</p>
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popular handout will need consequential alteration (obviously).		
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PRE13

Comment	Response	Action
Housing Suggest "new residential developments of 18 or more houses 5 are not enough.	The threshold of 5 units or more follows the policy SWDP 14: Market Housing Mix which also has this threshold.	No change.
Infrastructure Important to maintain the character of the town and of local neighbourhoods.	The policies within the MNP particularly in respect of design and heritage seek to reinforce the positive characteristics and attributes of the NPA.	No change.
Transport Important to respect the character of the green area in front of great Malvern station.	Agreed. The opportunity area at Great Malvern station does not include the green. It would be hoped that providing a dedicated car park would remove car parking around the green thus enhancing it.	No change.
Heritage The Old hospital in Lansdowne Crescent is a borderline case. It could be saved –but I don't think it has to be.	I think MTC's view is that it should be retained. Please advise?	Please advise? Agree with Peter Hamilton's response.
Green Infrastructure Important to consider "Neighbourhood" on the micro- as well as the macro-scale	I'm not sure what this means. The Neighbourhood Green Spaces include a mix of types from school playing fields to small areas of amenity spaces. Along with the Commons, ANOB, LGS I think that GI on both a macro and micro level has been	No change. Agree with Peter Hamilton's response.

<p>General Comments I have a vested interest as I live in Lansdowne crescent opposite the old hospital. It's a lovely neighbourhood with a lively community. Something needs to be done with the hospital site. Could be converted or demolished, I don't care but important in any new development to respect the character of the area and the wishes of the residents.</p>	<p>considered.</p> <p>I think MTC's view is that it should be retained. Please advise?</p>	<p>Please advise?</p>
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PRE14

Comment	Response	Action
<p>Housing Suggest "new residential developments of 18 or more houses.</p>	<p>The threshold of 5 units or more follows the policy SWDP 14: Market Housing Mix which also has this threshold.</p>	<p>No change.</p>
<p>Green Infrastructure Important to consider "Neighbourhood" on the micro- as well as the macro-scale</p>	<p>I'm not sure what this means. The Neighbourhood Green Spaces include a mix of types from school playing fields to small areas of amenity spaces. Along with the Commons, ANOB, LGS I think that GI on both a macro and micro level has been considered.</p>	<p>No change.</p>
<p>General comments Need to look at local infrastructure prior to any major development; I have worked in the NHS for years builders/developers always said they would build new Dr surgery etc. No thought on where they would get staff to work there or who would pay the wages.</p>	<p>Policy MI1 seeks to ensure that the provision of the appropriate infrastructure for that development is assessed and provided in a timely manner. Policy MC2 looks specifically at GP and dental services and capacity in relation to new development.</p>	<p>No change.</p>

Comment	Response	Action
<p>General Comments</p> <p>We consider the plan could be more proactive in ensuring its policies are consistent with the NPPF objectives, namely to boost the supply of housing in the district. It is clear that the priority of the plan is the protection of the most sensitive and valuable green spaces, including the hills and commons, a lot of which are designated as areas of outstanding Natural Beauty (AONB) and sites of special scientific interest (SSSI). This is understood and supported; albeit essential that this approach does not unnecessarily inhibit the growth potential of the town in areas that are not considered to warrant protection.</p>	<p>Paragraph 6.1.2 summarises the housing supply provision within the NPA. The existing completions, commitments and allocations more than meet the identified housing requirement. As such it was not considered additional sites need to be allocated. However, the MNP acknowledges that development will come forward over the plan period and as such identifies policies that seek to ensure these developments are appropriate to the intrinsic characteristics of the NPA.</p>	<p>No change.</p>
<p>Housing</p> <p>The MNP references the SWDP housing allocations but also recognises that other sites and windfall development are likely to be brought forward in the plan (the MNP) period. Housing types likely to be delivered as a proportion of larger sites, alongside market housing, it is essential to have a strong supply of sites to ensure that a healthy and diverse mix of house types can be provided. The MNP should accord with the objectives set out in the NPPF to ensure that the supply of housing is not only maintained but is boosted significantly. To provide a strong housing trajectory and meet all housing needs, including</p>	<p>Paragraph 6.1.2 summarises the housing supply provision within the NPA. The existing completions, commitments and allocations more than meet the identified housing requirement. As such it was not considered additional sites need to be allocated. However, the MNP acknowledges that development will come forward over the plan period and as such identifies policies that seek to ensure these developments are appropriate to the intrinsic characteristics of the NPA.</p>	<p>No change.</p>

<p>for affordable and elderly homes as well as market housing, the MNP should proactively engage with the community in identifying additional sites that can contribute further to Malvern's housing supply.</p> <p>The identification of future housing sites would enable Malvern to have a planned approach to additional growth. This would safeguard Malvern in terms of maintaining a 5 year housing land supply.</p> <p>We consider that the MNP process should undertake a site assessment and selection process, including a 'call for sites' so that the Town Council and local community can take an informed decision on the most sustainable locations that can be allocated to help futureproof Malvern's housing supply.</p> <p>We consider that there are other deliverable sites, immediately adjacent to the existing settlement boundary that is available to meet Malvern's housing need. Such sites can be brought forward for development without significant detrimental effects on the valuable green spaces.</p> <p>The SWDP allocations are not a maximum and should not inhibit a planned approach to growth. This should be reflected in Draft Policies MH2 and MH3 which should acknowledge the potential contribution that other sites (beyond the SWDP allocations) can make to Malvern's housing supply.</p> <p>We also acknowledge that the MNP suggests a requirement for a Local Housing Provision Statement to be submitted with most residential</p>	<p>Any additional site allocations will be part of a review of the SWDP and as a result the MNP.</p>	
		<p>This will be discussed with MHDC to see whether it can be included in the 'local' validation requirements for relevant planning applications.</p>

<p>planning applications. We assume that the ability to suggest additional planning application documents has been discussed and agreed with Malvern Hills District Council to ensure a consistent approach.</p>		
<p>Green Infrastructure We recognise and support the importance of protecting the most valuable and sensitive green spaces within the MNP area. However, we note that the figures (within the accompanying document) that indicate the sites that have been designated through Chapter 6 are not yet available.</p>	<p>They will be available at the Regulation 14 consultation.</p>	<p>No change.</p>

PRE16

Comment	Response	Action
<p>Transport The strip of land by Great Malvern station has/had a railway carriage, which was to be renovated for a living area. To whom does the area belong?</p>	<p>Is it possible to look into this issue to see whether there is anyone living (within an old railway carriage) on this land please?</p>	<p>Please advise? Am currently trying to find the answer to this.</p>
<p>Heritage The list of non-designated heritage assets is insufficient to protect the heritage in the area. Nominations for the Local List have for many years been sent to MHDC but they have not taken any action to progress the Local List. Malvern Civic Society started this about ten years ago.</p>	<p>The MNP acknowledges that this is the start of the process of nominating buildings and structures for local listing and that those identified thus far is an initial list. MTC welcome further nominations. MTC will continue to liaise with MHDC to conclude the process for this initial list of nominations.</p>	<p>No change.</p>
<p>Community MC1 – properties should be actively marketed and be open to all offers, especially if planning applications have been refused.</p>	<p>Can add the word 'actively' before marketed in point 2 of the policy.</p>	<p>Amend.</p>

PRE17

Comment	Response	Action
<p>Housing Need clarity on difference between low cost market and affordable for the public. Would suggest 20% social, 20% low cost market. New residential should be inspirational not bog-standard urban extension. Incorporate experience of North site.</p>	<p>The terms can be included within the glossary (affordable housing already is). Where is the evidence for this split? Design policies seek to ensure that new development responds and reinforces positive characteristics of the area.</p>	<p>Amend.</p>
<p>Employment Focus on building of technical /scientific based from??? Focus on cyber technology. Also care of elderly as employment opportunity. No to more warehousing etc.</p>	<p>The type of employment development that will come forward will depend on the market. The MNP seeks to ensure the protection of the employment allocations within the SWDP and the existing employment areas to ensure there is a sufficient supply of land for a variety of employment uses to meet demand.</p>	<p>No change.</p>
<p>Design Too bland, need to be stronger on inspirational design for an aspirational town.</p>	<p>This policy will be supported by the Heritage Character Assessment which will provide more detail around the local vernacular and how new development should reinforce and respond to the positive characteristics of the NPA.</p>	<p>No change.</p>
<p>Infrastructure Vital prerequisite to any development, work with WCC, comment on hospitals here?</p>	<p>Can add in RJ working with statutory authorities and utility companies. I think the hospital would be covered by MC1</p>	<p>Amend.</p>
<p>Transport Focus on supporting WCC to open up former siding at Malvern Link. Great Malvern not practical as conservation area – lack of??? Get trains back up to speed of “Days of Steam”. Ensure direct trains to Oxford/London???</p>	<p>MC5 seeks to do this at Malvern Link. MC4 has criteria around protecting the heritage at and around the station. Issues around train services, etc. are out with the remit of the MNP.</p>	<p>No change.</p>

<p>Heritage More emphasis on building on heritage at Malvern. Include music and arts. Key to attract inward migration – support inspirational town.</p>	<p>The MNP includes two policies relating to heritage – local heritage assets and neighbourhood heritage areas – that seeks to protect these. There is a process for identifying local assets and these could include buildings/structure and areas that celebrate music and the arts. This is separate to the MNP and is being led by MTC.</p>	<p>No change.</p>
<p>Retail Centre of Great Malvern needs agreement on roads/pavements. Then release WCC monies as have been provided to?? And as Evesham.</p>	<p>The Public Realm Framework for Great Malvern and the Route to the Hills Strategy should provide some improvements to Great Malvern. More could be done including the provision of a square/focal point. In addition public realm improvements within Malvern Link and Barnard's Green are identified within the MNP.</p>	<p>No change.</p>
<p>Green Infrastructure Absolutely key to setting of Malvern.</p>	<p>Noted.</p>	<p>No change.</p>
<p>Community ???? ???? And support conservation areas, stronger planning and enforcements in conservation areas.</p>	<p>The MNP seeks to provide strong local policies relating to the NPA. The issue of enforcement is for MHDC.</p>	<p>No change.</p>
<p>Any other comments Vastly better than previous reports; good presentation, visuals and clarity.</p>	<p>Noted</p>	<p></p>

Comment	Response	Action
<p>Housing Malvern needs policies which a) offer greater protection to heritage properties (particularly those left empty) and b) take action on properties left empty.</p>	<p>MHE1 seeks to protect local heritage assets. Initiatives to deal with empty properties would need a multi-agency approach and would be outside of the remit of the MNP.</p>	<p>No change.</p>
<p>Employment Need policies which make developments more attractive and “green”. Need to enhance small business opportunities with grants. Need to offer opportunities to alternative energy research providers.</p>	<p>Grants/alternative energy providers are out with the remit of the MNP. The design policies seek to ensure attractive and ‘green’ (sustainable) developments.</p>	<p>No change.</p>
<p>Design As above.</p>	<p>Noted.</p>	<p>No change.</p>
<p>Transport Need better cycle lanes, town centres need to have a 20mph limit throughout, Malvern centre needs “woonerfs” or shared streets for pedestrians, cars and cycles – excellent for residents, tourists and retailers.</p>	<p>The MNP seeks to provide sustainable transport routes which would include off-road cycle routes where possible. Pedestrianising Great Malvern town centre could be included within the list of projects?</p>	<p>Please advise? This is out for consultation with WCC pedestrianisation looks unlikely options are one way down church street or general improvements to streetscape including widening of pavements and pedestrianising the road in front of Abbey gateway.</p>
<p>Heritage Need to robustly implement and police heritage policies.</p>	<p>Enforcement is the responsibility of MHDC.</p>	<p>No change.</p>
<p>Retail Need to better enhance heritage aspect of buildings in town centres and ensure retailers/offices have sympathetic shop fronts.</p>	<p>The MNP could include a policy relating to shop fronts and their design and adverts. Need to check whether the SWDP refers to this and whether there is an SPD relating to shopfront design.</p>	<p>Please advise? As before</p>

<p>Green infrastructure LGS, NGS, NCA need full protection. Landscapes/ woodlands etc. need to be enhanced as well as protected.</p> <p>Community Need collaboration between public health, GPs, hospital for promotion of activities to enhance health/lifestyles. Need activities to enhance community cohesiveness and reduce isolation.</p> <p>Any other comments Project ideas are excellent. Need more collaboration amongst stakeholders to enhance tourism offer. Retain TIC in current location.</p>	<p>This is what the policies seek to do within the parameters of national and local planning policy (NPPF and SWDP).</p> <p>MC2 seeks to ensure there is sufficient GP and dental services for new developments. Agree with the comments but these initiatives are out with the remit of the MNP. The MNP can seek to protect/provide greenspaces and sustainable transport routes thus providing the opportunities for activities to take place on them. Noted.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>
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PRE19

Comment	Response	Action
<p>Housing Malvern needs more social and affordable housing both for sale and rented. It particularly needs more housing for the elderly – an extension of Clarence Park plus another similar development for the Barnards Green side of Malvern. Festival Housing needs to be encouraged to build more housing.</p>	<p>MTC have, through Locality technical support, had a Housing Needs Assessment Report produced. This provides an evidenced base assessment of the type of housing needed within the NPA. This document indicates that retirement housing along with extra care housing is required as is family housing. The document should be used by applicants submitting housing development to demonstrate they are providing housing to meet need. It should also be used by the LPA in their assessment of whether the proposed housing is satisfying the identified need.</p>	<p>No change.</p>
<p>Employment To protect business in Spring Lane, some of the networks of footpaths need to be shut off for security. They can be allowed to develop as green lungs around the estate. More cycle paths need to be developed and the area provided with a better bus service – to ALL parts of Malvern.</p>	<p>Is there a known issue of break-ins, etc. within Spring Lane industrial estate? The footpaths and green space around them are important for connectivity and biodiversity. The MNP promotes sustainable transport routes which includes cycling. The MNP and other planning documents can look to ensure that new development can be designed so that it can accommodate bus routes however; it is up to the bus operators where and how frequently they run their services.</p>	<p>No change.</p>
<p>Design Malvern needs more designated cycle routes. Cycle storage should be included in additional general storage. More people should be encouraged to provide themselves with off-street parking to combat parking on pavements.</p>	<p>MT3 'Sustainable Transport Routes' promotes cycle routes within the NPA. Cycle storage is included within then list of elements within MD3 'Detailed Design Elements'. The MNP can't make people provide off-street parking. However, MD2 'Development and Accessibility Principles' seeks to ensure new development provides adequate</p>	<p>No change.</p>

<p>Infrastructure</p> <p>Flooding is still an issue in parts of Malvern; particular care needs to be taken in provision for sudden water flows. I am extremely concerned over the proposed access to the new village development at Newland. One exit/entrance is not enough. Malvern Vale is half the size and has two vehicle access points – but NO cycle paths.</p>	<p>off-street parking.</p> <p>Flood Risk within the NPA is summarised at paragraphs 3.14-3.16. According to the Strategic Flood Risk Assessment carried out to inform the SWDP there are only limited areas within the NPA where surface water flooding has been a problem. However, the infrastructure policies seek to ensure that adequate infrastructure and utilities are provided to service future developments. MTC have lobbied vigorously for there to be more than one access point to the site during the SWDP process and as part of representations to the current planning application. In addition MTC have also argued for other forms of transport and access to be provided including a rail halt. This has been included within the 'projects' section of the MNP.</p>	<p>No change.</p>
<p>Transport</p> <p>I don't believe duelling the Carrington Bridge will solve the delays on this vital route to the motorway network. It will still end in a series of roundabouts. The money would be better spent on a flyover or underpass work.</p>	<p>As mentioned previously the MNP can refer to a number of issues that affects connectivity with the motorway network.</p>	<p>Amend.</p>
<p>Heritage</p> <p>This needs to extend to areas of Malvern outside Great Malvern. There are heritage areas in Malvern Link, north and west Malvern, that need highlighting and protecting. More needs to be done to stop people changing the names of houses in the heritage areas, the names are a vital part of the heritage.</p>	<p>MTC have, through Locality technical support, commissioned a Heritage Character Assessment. This report provides an evidenced based assessment of the character of the NPA including the local vernacular. The MNP includes a proposal to designate Neighbourhood Heritage Areas and a policy that supports the protection of the historic and/or architectural interest of these areas. It would be useful to know if this representor has specific areas in mind.</p>	<p>No change.</p>

<p>Retail More needs to be done to ensure the public can easily reach the retail centre by bus. At present, Malvern has no bus service. We do not need a bus into Worcester every 10 minutes, every 20 minutes is sufficient. The rest of the buses could provide a better service around Malvern and reach those parts which have no service at present. In particular we need two-way and not circular routes.</p>	<p>I'm not sure we can stop people changing the names of buildings. The MNP and other planning documents can look to ensure that new development can be designed so that it can accommodate bus routes however; it is up to the bus operators where and how frequently they run their services.</p>	<p>No change.</p>
<p>Green Infrastructure I do not agree that Hayslan Fields need to be kept as a green space (MG1). It is ideal for housing and Malvern Link Common is 5 minutes' walk away. I do agree with the other spaces.</p>	<p>I think this runs counter to popular opinion?</p>	<p>Please advise? Agree with Peter Hamilton's comments.</p>
<p>Community MC2 – this may be the wrong way round - development will bring services but provision should be made for the development of these services. E.g. Malvern Vale needed space for a GP surgery/ dentist/ optician. If space had been provided the services would have come. Perhaps some of the area scheduled for industrial use could be utilised.</p>	<p>MC2 seeks to ascertain whether there is sufficient existing capacity to accommodate the occupiers of new development. If there isn't enough capacity then a contribution may be required from the development to go towards increasing capacity. My understanding is that most people wish to see the retention of the employment land within the allocated site protected for employment uses.</p>	<p>No change.</p>
<p>Any other comments I would support MTC taking over Belle Vue Terrace and the Tourist Information Bureau. Malvern is more than just Great Malvern; more emphasis should be placed on Malvern as a whole rather than the "historic spa" area of Great Malvern.</p>	<p>Noted. The MNP provides policies that relate to the whole of the NPA. The context, vision, objectives and strategy refer to other areas of the NPA than Great Malvern. There are projects within Section 7 that relate to sites/areas outside of Great Malvern.</p>	<p>No change.</p>

PRE20

Comment	Response	Action
Employment Priority employment to those who live in Malvern when applying for work positions with companies in Malvern.	Not within the remit of the MNP and I think there could be issues to do with equal opportunity legislation.	No change.
Transport A study to see if opening a small rail station at Newland North East for rail use as an alternative to using cars and ??? To other locations.	This is included within Section 7 of the MNP as a project that MTC will lobby for. MTC have also made such representations in relation to the SWDP and the planning application for the site.	No change.
Retail We don't need 24-hour food shops in the retail park. We already have two 24-hour shops in Malvern Link who are open for food and petrol and "coffee",	The planning issue of 24 hour opening is mainly around potential disturbance to local residents from the operation. There is other legislation dealing with trading hours.	No change.

PRE21

Comment	Response	Action
<p>Infrastructure/Green Infrastructure</p> <p>My first Impression of the draft NP is that it welcomes new housing development with open arms. (Objective no 1 support and encourage new housing) which doesn't consider the receiving environment to be an important factor in determining where it goes (landscape character is the 12th and last objective).</p> <p>Clearly, if that is what the local community's priorities are, then it is right that the Np reflects this, however, in my opinion, the high quality and high value landscapes of the area are the towns USP and should be fully respected.</p> <p>There appears to be no mention of the AONB, or its guidance on landscape character, views and colour that needs to be followed when considering new development. The majority of the Np area may not fall within the AONB, but the boundary is not an iron curtain, and national and local planning policy and guidance emphasise the importance of respecting the Hills context and setting (see comments on the SWDP's AONB Policy 23 below).</p> <p>Malvern's landscape's give the town its sense of place and local distinctiveness, which play a significant role in the areas tourism offer in particular (SWDP 23 and AONB guidance).</p>		

<p>Para. 109 of the NPPF requires the planning system to contribute to and enhance the natural and local environment by firstly protecting and enhancing 'Valued landscapes', i.e. those which are not nationally-designated but of value for a number of reasons. I have successfully argued that many parts of the Malvern's are valued landscapes in the context of para 109.</p> <p>I would like to see objective 12 placed higher on the list – it should certainly be above objective 7 and probably 6 since 'landscape' encompasses and integrates all of these factors (Gi, heritage, biodiversity etc.), which contribute TO it.</p> <p>Another issue is that the wording of the landscape character section of the GI policy (MG5) doesn't tally with the wording of objective 12.</p> <p>Whilst objective 12 is to retain and enhance landscape character (which is closer to the SWDP landscape character policy 25 objective – see below).</p> <p>Policy MG5 only requires landscape character to be considered (and if within the settlement boundary – it should be considered within and without the boundary). Where adverse effects arise, they must simply be appropriately mitigated for.</p> <p>I disagree that landscape character should be included only under the GI Policy MG5 heading. In my opinion, the NP policy headings and content</p>		
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<p>should reflect those of the SWDP much more closely, and landscape character should be a separate policy.</p> <p>SWDP policy 25: Landscape Character sits under the heading 'Environmental Enhancement and Protection'. Part A is as follows:</p> <p>Development proposals and their associated landscaping schemes must demonstrate the following:</p> <ol style="list-style-type: none">1. That they take into account the latest Landscape Character Assessment and its guidelines; and2. That they are appropriate to, and integrate with, the character of the landscape setting; and3. That they conserve, and where appropriate, enhance the primary characteristics defined in the character assessments and important features of the land cover Parcel, and have taken any available opportunity to enhance the landscape. <p>Part B of the policy requires landscape and visual impact Assessments (LViAs) to be produced for all major development proposals and for other proposals where they are likely to have a detrimental impact on landscape attributes, features and/ or resources, and the LVIA should include proposals to protect and conserve key landscape features and attributes and where appropriate enhance landscape quality.</p> <p>The reasoned justification for the policy, which is highly relevant to Malvern, is as follows:</p>		
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The distinctive landscape of south Worcestershire is an important factor in the relatively high quality of life experienced by most residents. The landscape contributes too much of our decision making e.g. – where people choose to live, work and spend their leisure time. The landscape is also a distinctive heritage asset, which is reflected in a relatively buoyant tourism market within the local economy. **To allow inappropriate development would compromise both the general wellbeing and the economic viability of south Worcestershire (my emphasis)**

I see no reason for the NP landscape character policy wording to deviate from that of the SWDP.

The NPs GI Policy should also be revisited to ensure that it is in line with the requirements of the NPPF and SWDP. It should demonstrate an evidence-based understanding of Malvern's diverse GI functions and assets (all contained within, and part of the landscape) and a firm commitment to their protection and enhancement. GI objectives should be considered in all new development in order to ensure that strategic GI links in particular (recreational, ecological hydrological etc.) are identified and integrated into new schemes as opposed to being compromised to the detriment of the wider area.

Part A of SWDP policy 23: The Cotswolds and Malvern Hills Area of Outstanding Natural Beauty (AONB) states that **Development that would have**

a detrimental impact on the natural beauty of an AONB (as shown on the policies map) will not be permitted.

In notes that 'The nature of the topography is such that even a small scale development can have a significant visual impact on the principal attributes of an AONB and emphasises that for development out with but affecting an AONB, regard should be had to the purpose of conserving and enhancing its natural beauty.

I my opinion the AONB should be afforded more weight in the NP and its policies. Has the AONB partnership been consulted?

It may be necessary to review other policies in the light of the above. Especially in order to make it clear that all new development should respect and enhance landscape character, sense of place and local distinctiveness and that GI should be another thread running through the plan which binds the policies together.

PRE22

General Comments

Under the heading projects on the last page – HSM has been involved in a plan to bring to Malvern a major Science and technology project aimed at informing and enthusing young minds thereby encouraging young people to pursue careers in STEM subjects. Science, technology, Engineering and Maths.

Plans are well advanced and our vision for the future of this project will be brought before the public on Saturday October 7th 2017 at Malvern festival of innovation family day, at Malvern Theatres.

HSM has supported Malvern's community partnership with Marianske Lazne in the Czech Republic since the inception in 2012. The Czechs have an enviable record of developing STEM subjects and providing the relevant University or Technical College courses. In part this can be ascribed to the Czechs desire to involve students from a very early age through the provision of interesting and interactive educational facilities. Thanks to our contacts in the Czech academy of science in Prague and ongoing cooperation with the staff of the Czech Embassy in London, we have been able to secure interest in an Anglo/Czech cooperative partnership at Ambassador level. This could bring to Malvern an

<p>exciting interactive venue.</p> <p>Following our participation in Malvern Festival of innovation it is hope that HSM will be able to work with the Town Council amongst others to bring this project to fruition.</p>		
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