

Martley, Knightwick & Doddenham Neighbourhood Development Plan

Regulation 14 Consultation Draft

Consultation 5th September – 17th October 2016

Table 1 Malvern Hills District Council Officer Comments

Draft Policies	Officer Comments	Parish Council Consideration	Amends to NDP
Formal Public Consultation on the Draft NDP			
1.1	<p>Next Steps Paragraph 1, 2nd sentence – It is anticipated that the NDP will should ... Paragraph 2, 1st sentence - ... further 6 weeks' consultation, possibly in Winter 2016/2017.</p>	Noted.	<p>Update and Amend Plan.</p> <p><u>Delete P6 Next Steps</u></p> <p>Insert:</p> <p>Submission Plan</p> <p>“This submission version of the Martley, Knightwick and Doddenham NDP has been prepared taking into careful consideration all the representations provided during the Regulation 14 consultation in Autumn 2016. It is anticipated that the NDP will be submitted to Malvern Hills District Council in early 2017. The District Council will check that the Plan complies with relevant legislation and publish it for a further six weeks' consultation.”</p>

Introduction and Background			
1.2	<p>Paragraph 1.1.1 – 2nd sentence - ... Parish Councils (and or other qualifying bodies) ...</p> <p>3rd sentence - ... local strategic policies ...</p> <p>4th sentence – The Draft Plan</p> <p>Paragraph 1.1.3 – Reference is made to a household survey in summer 2011 and open days in October 2011 and September 2012. It is noted that Martley, Knightwick and Doddenham (MKD) did not apply to be designated as a neighbourhood area until July 2013.</p> <p>Paragraph 1.4.1 – final sentence – The appendices include proposed protected views and proposed Local Green Spaces.</p>	Accepted.	<p>Update and Amend Plan.</p> <p>Paragraph 1.1.1 – 2nd sentence - ... “Parish Councils (or other qualifying bodies)”</p> <p>3rd sentence -amend to “strategic planning policies”</p> <p>Para 1.1.3 insert at end of first sentence “Some of these consultations were undertaken before the neighbourhood area was designated in July 2013, however they were all used to help inform the content and scope of the proposed NDP. Further information about this is provided in the accompanying Consultation Statement.”</p> <p>Delete rest of 1.1.3 and transfer to Consultation Statement.</p> <p>Update text with reference to Reg 14 consultation.</p> <p>Para 1.4.1 Final sentence: Amend to: “The appendices include a schedule of proposed protected views and a glossary of technical terms and a bibliography.”</p>
The Planning Policy Context			
1.3	<p>Paragraph 2.1.1- ... the achievement of ‘sustainable development’. Resolution 42/187 of the which it defines (in conformity with the United Nation General Assembly defined sustainable development</p>	<p>Accepted.</p> <p>Note in addition further extracts have been added from the NPPF to reflect the Plan’s positive</p>	<p>Update and Amend Plan as suggested.</p> <p>Amend Paragraph 2.1.1 to: “The NPPF states that the purpose of the planning system is to contribute to the achievement of ‘sustainable development’.</p>

	<p>resolution 42/187) as ‘meeting the needs of the present without compromising the ability of future generations to meet their own needs’. However, The NPPF then proceeds to define ‘sustainability’ in successively narrower terms.</p> <p>Paragraph 2.1.2 - Paragraph 9 says of NPPF has the following definition of sustainable development:</p> <p>Paragraph 2.1.2 - widening the choice of high quality homes should be a 5th bullet point</p> <p>Paragraph 2.1.3 - Paragraph 14 states that ‘At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development’. For plan-making this, which means that ‘local planning authorities should positively seek opportunities to meet the development needs of their area’ and for decision-taking this means should approving e-without delay development proposals that conform to the local plan.</p> <p>Paragraph 2.1.4 – 1st bullet point - Develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;</p>	<p>planning framework for protecting and enhancing local landscapes and natural and built heritage.</p>	<p>Resolution 42/187 of the United Nations General Assembly defined sustainable development as ‘meeting the needs of the present without compromising the ability of future generations to meet their own needs’.”</p> <p>Amend Para 2.1.2 “Paragraph 9 says...”</p> <p>Amend to 5th bullet point “widening the choice of high quality homes”</p> <p>Amend Para 2.1.3 to “At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development’. For plan-making this means that ‘local planning authorities should positively seek opportunities to meet the development needs of their area’ and for decision-taking this means approving without delay development proposals that conform to the local plan.”</p> <p>Amend Para 2.1.4 1st bullet point to “Develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;”</p> <p>Amend Para 2.2.2: <u>Swap order of first 2 bullet points.</u></p> <p>Para 2.3.1 Amend date to August 2012. <u>Delete “endorsed”</u> and replace with “is used by”.</p>
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	<p>Paragraph 2.2.2 – It is suggested that the order of the two bullet points is swapped – i.e. the first bullet point relates to the vision, and the second to the planning policies.</p> <p>Paragraph 2.3.1 Reference is made to the Landscape Character Assessment (LCA) Supplementary Guidance, Worcestershire County Council, October 2011. Should this be August 2012? It should be noted that whilst planning officers use the LCA, it is not accurate to say that it has been endorsed by Malvern Hills District Council.</p>		
Vision and Objectives			
1.4	Draft Vision - The draft Vision does not mention sufficient homes to meet local needs, although this is picked up in Objective 3. Is this an oversight?	<p>Noted.</p> <p>The Steering Group and Parish Council did not support an amendment to the vision to include a phrase on housing.</p>	No change.
1.5	Map 3 – Proposals Map. Before the Proposals Map there needs to be an explanation of what the proposals are, including an explanation of what settlement boundaries are and what changes are proposed. Also, explain what the proposed Local Green Spaces 1 to 7	<p>Accepted.</p> <p>Note – SWDP refers to “development boundary” rather than “settlement boundary so use this term.</p>	<p>Insert additional text before Map 3: “Map 3 is the Policies Map relating to Martley Village. It shows the proposed development boundaries. A development boundary is the boundary between areas of built/urban development (the settlement) and non-urban or rural development (ie the open countryside).</p>

	<p>are.</p>	<p>Note – NPPG refers to Policies Map rather than Proposals Map.</p> <p>Further information about the justification for the development boundaries is provided in the housing chapter of the NDP.</p>	<p>The development boundaries in Martley include areas of housing and existing built form, as well as sites which have planning approval for new development, or where development is in the process of being built. The proposed development boundary is in three sections, and differs from that proposed in the South Worcestershire Development Plan because it includes development which has been approved subsequent to the completion of the SWDP.</p> <p>Martley Village is a scattered settlement with three distinct clusters of housing, each of which has a separate boundary, as shown on Map 3. The western cluster comprises houses along the B4197, the St Peters Estate and contiguous areas of older housing, and the new Hopyards (Crown Meadow) Estate. The middle cluster includes the original settlement near the Parish Church, while the eastern cluster comprises newer houses along the Worcester Road and the area designated for the recently-approved Orchards Estate.</p> <p>Map 3 also includes proposed areas of Local Green Space. These are areas that are considered to meet the criteria set out in the NPPF and which are protected from development other than in very special circumstances. They are:</p> <ol style="list-style-type: none"> 1. Chantry Academy Conservation Area. 2. Millennium Green. 3. Badger Green. 4. Hollins Lane banks. 5. Martley Playing Field. 6. Crown Orchard. 7. Hopyards Green. 8. Crown Meadow <p>One other area of proposed Green Space shown on Map 10 is:</p> <ol style="list-style-type: none"> 9. Ankerdine Common.
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			<p><u>Change all “settlement boundary” references to “development Boundary” to be consistent with SWDP.</u></p> <p><u>Change all references to “Proposals Map” to “Policies Map.”</u></p>
4.0 Landscape 1.6	Paragraph 4.1 – “minimising impacts on biodiversity and, where possible, providing net gains in biodiversity” should be a 3 rd bullet point.	Accepted.	Amend para 4.1 – <u>provide 3rd bullet point as suggested.</u>
1.7	Map 4 (Landscape Types) – it would be helpful if the map focussed on the MKD neighbourhood area.	Accepted.	Amend Map to focus on neighbourhood area.
1.8	Paragraphs 4.4 – 4.7 describe the landscape character areas in the MKD neighbourhood area, as identified in the Worcestershire County Council’s Landscape Character Assessment Supplementary Guidance (2012). There are several references in paragraphs 4.5, 4.6 and 4.7 to “the report”. It would be helpful if it was made clearer whether “the report” means the LCA Supplementary Guidance.	Accepted.	Amend references to “the report” to read: “the LCA Supplementary Guidance”
1.9	Map 5 (Environmental Assets) helpfully shows the location of the AONB and SSSI’s in the MKD Neighbourhood Area.	Not accepted. The Scheduled Monument will be shown on new map showing	No change.

	<p>Paragraph 4.8 also makes reference to a Local Nature Reserve, a designated Millennium Green and a Scheduled Ancient Monument.</p> <p>Would it be possible to show the location of these on Map 5?</p>	<p>heritage assets. This map (5) refers to natural heritage assets. The LNR and Millennium Green are shown on Map 6.</p>	
1.10	<p>Paragraphs 4.9 and 4.10 – lists local features which local residents consider should be “designated for conservation”.</p> <p>It is not clear why, or on what planning basis, the landscape features were proposed for conservation. It should be noted that the basis for designating assets / features for special protection needs to be on the planning merits, not a popularity poll.</p>	<p>Noted.</p> <p>This section sets out the responses to the public consultation and highlights those local features which local residents would like to see protected. These features are noted in the NDP; some enjoy a level of protection already through wildlife / geodiversity or built heritage significance, whilst others are identified for protection in the NDP eg as Local Green Spaces. This could be clarified in the supporting text.</p>	<p>Amend Plan.</p> <p>Insert additional supporting text to the end of para 4.12:</p> <p>“These features are noted in the NDP. Some enjoy a level of protection already through wildlife / geodiversity or built heritage significance, whilst others are identified for protection in the NDP such as Local Green Spaces. These are identified later in the NDP.”</p>
1.11	<p>Paragraph 4.11 - indicates that the community perceive flooding to be the “main environmental hazard”. Is there any evidence to substantiate the extent of flooding as a problem in MKD?</p>	<p>Noted.</p> <p>Evidence for flood related incidents is provided in the text of paragraph 4.13 which records the proportion of respondents who have experienced flood damage to properties. The supporting</p>	<p>Amend Plan.</p> <p>Insert additional wording to end of para 4.13:</p> <p>“Further detail and information about areas at risk of flooding can be found on the Environment Agency Flood Maps for Planning – see http://apps.environment-agency.gov.uk/wiyby/37837.aspx . The use of SuDS is promoted in Policy MKD1 as part of landscape design schemes.”</p>

		text could be strengthened by a reference to the Environment Agency flood maps.	
	<p><i>Paragraphs 4.12 – 4.13 outlines a landscape character assessment (LCA) undertaken by a neighbourhood planning working group. The relationship of the local LCA with the County Council LCA is not clear. The local LCA is a beautifully written description of the natural environment and key landscape features in the MKD neighbourhood area, but much of it is not directly relevant to Policy MKD1.</i></p> <p>Planning Practice Guidance says that robust, proportionate, evidence should succinctly explain the intention and rationale of the policies. The evidence is to support the choices made and the approach taken – not to generally describe conditions in an area. It is suggested that the local LCA may be more appropriately included as a Background Report to support the neighbourhood plan.</p>	<p>Not accepted.</p> <p>This section of supporting text was researched and written by members of the NDP steering group – people of live and work in the area and know the landscape and built and natural heritage assets intimately. The assessment used Place Check methodology provided by Worcestershire Archive and Archaeology Service, and volunteers were trained and supported by a former Historic landscape Officer from WCC.</p> <p>The Worcestershire LCA work is also referenced and relevant extracts are used in the supporting text, but this guidance is a higher level piece of work, describing broad areas of landscape character area types prevalent across the whole of the county of Worcestershire.</p> <p>The additional locally based supporting evidence in the NDP</p>	No change.

		<p>adds value and detail to the higher level, more strategic descriptions of generic landscape character types. This information is an important aspect of the NDP; it is a means of ensuring that the NDP policies are relevant to the local landscape context of the neighbourhood area, and therefore to local people. In reading this section, local residents should understand that the document has been prepared by volunteers who understand and care passionately about their local area and are working to protect its special characteristics.</p> <p>The NPPF Core Planning principles advise that <i>planning should be</i> (amongst other things):</p> <ul style="list-style-type: none"> ● <i>genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area.</i> ● <i>not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which</i> 	
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		<p><i>people live their lives.</i></p> <p>Para. 183 sets out that <i>“Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need.”</i></p> <p>Descriptions of local landscape character in the NDP make an important contribution to that shared vision – to protect what is special and distinctive about Martley, Knightwick and Doddenham.</p>	
	<p>Paragraph 4.14 – highlights the importance of good design of the built environment.</p> <p>It is suggested that this may be more appropriately included to support Policies MKD 2 and MKD 3 (Building Design Principles within and outside the Martley Conservation Area.</p>	Accepted.	<p>Delete paragraph: “The NPPF highlights the importance of the design of the built environment and indicates that good design is a key aspect of sustainable development. In order to achieve this neighbourhood plans should set out robust and comprehensive policies that set out the quality of development that will be expected for an area, including the need to respond to local character. Policy SWDP21 (Design) reflects this guidance and sets out criteria that will be used to assess development proposals in the South Worcestershire context.”</p> <p><u>And move text to new paragraph before 5.1</u></p>
1.12	Paragraphs 4.15 – 4.17 – It is not strictly accurate to say that NPPG relating to solar	Accepted.	Amend Plan.

	farms provides the background to SWDP 27 (Renewable and Low Carbon Energy) or that this provides a context for Policy MKD1(6).		<u>Delete paragraph 4.17.</u>
1.13	<p>Paragraphs 4.1 to 4.18 provide a general description of the landscape character and features in the MKD area and provide some general links to the Framework.</p> <p>However, Guidance says that proportionate, robust evidence should succinctly explain the intention and rationale of the policies. The evidence is to support the choices made and the approach taken.</p> <p>It is considered that the general descriptions and information included in paragraphs 4.1 to 4.18 do not provide proportionate, robust evidence to explain the rationale to the detailed requirements in Policy MKD1.</p>	<p>Not accepted.</p> <p>See response to 1.11 above.</p> <p>Insert</p>	No change.
4.0 Landscape			
MKD1 1.14	<p>General Comments on Policy MKD 1</p> <p>MKD1 tries to address too many different issues.</p> <p>The policy is seeking to protect 26</p>	<p>Noted.</p> <p>The evidence base is provided in the supporting text and includes both the Landscape Character Guidance prepared by</p>	<p>Amend Plan.</p> <p>Amend Policy MKD1.</p> <p>Amend first sentence to read “All new proposals for built development should ...”</p>

	<p>Significant Views, address design and layout, boundary treatments, protect undefined biodiversity assets, protect trees, address the possible development of polytunnels, glasshouses and solar farms, encourage sustainable drainage systems and protect a range of geological and landscape features.</p> <p>As currently drafted, it is considered that MKD1 does not provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency, as required by paragraph 17 of the Framework.</p> <p>There is also a lack of robust, proportionate, evidence to support the approach proposed in relation to many issues covered in MKD1.</p> <p>Policy MKD1 says that “all new development proposals must demonstrate to following”.</p> <p>Is the intention of the policy to apply to <u>all</u> development proposals, irrespective of size and location?</p> <p>The policy does not say how applicants should demonstrate that their proposals</p>	<p>Worcestershire County Council and the detailed local descriptions of the neighbourhood area provided by the members of the steering group.</p> <p>The Policy could be amended in order to improve clarity and strength.</p> <p>The policy is aimed to provide guidance to all new built development. It will be up to the applicant to demonstrate how the criteria for landscape design guidelines have been met.</p> <p>Also note Examiner’s re requiring the term “must” to be replaced with “should”.</p>	
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	have regard to MKD1 (1) to (9).		
1.15	<p>MKD1(1) Significant Views</p> <p>Policy MKD1(1) seeks to minimise the adverse impact of new development on 26 Significant Views identified in Appendix 1 and on Maps 11 and 12.</p> <p>Whilst national and local planning policy protects local character, it does not provide or protect a “right to a view.” Consequently, land use planning policies relating to key vistas, intrinsic to local character, need to be carefully and appropriately worded.</p> <p>Planning policies can seek to protect specific views where this is justified in the wider public interest (for example from a public footpath, right of way, roadside, or other publically accessible land).</p> <p>A clear justification needs to be provided for the protection of each view.</p> <p>It is important that the views and vistas to which policies and proposals apply are clearly identified in order to provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and</p>	<p>Noted.</p> <p>Amend Policy wording to add clarity.</p>	<p>Amend Plan.</p> <p>See 1.23 below.</p>

	<p>efficiency as required by paragraph 17 of the Framework. The inclusion of Maps 11 and 12 and photographs taken from viewpoints is a very helpful feature of the Draft MKD Plan providing additional clarity to assist decision making.</p> <p>It is noted that 17 of the views are identified in the Martley Conservation Area Appraisal and Management Strategy.</p> <p>Is the policy saying that development within these views could be supported subject to careful siting, design and development being of an appropriate scale? Clarification on this matter would be helpful.</p>		
1.16	<p>MKD1(2) Design and Layout</p> <p>MKD1(2) seeks to ensure that the design and layout of new development is in keeping with the scattered settlement character of the villages and hamlets.</p> <p>The supporting evidence for MKD1(2) appears to be paragraph 4.14 but the justification for what is proposed appears to be weak.</p> <p>It is considered that MKD1(2) lacks sufficient clarity for a decision maker to</p>	<p>Accepted.</p> <p>Add further information to para 4.15 to clarify the scattered settlement character.</p>	<p>Amend Plan.</p> <p>Insert additional text to section:</p> <p>“The Worcestershire County Landscape Character Assessment Supplementary Guidance provides advice about protecting local settlement patterns. In areas of principle timbered farmlands additional individual dwellings could be accommodated within the dispersed settlement pattern as long as they do not occur in sufficient density to convert the pattern to wayside or clustered status. Modern development favouring groups or clusters of new houses would not be appropriate in this landscape. In areas of principle wooded hills the sparsely scattered settlement pattern consists of occasional dwellings which were traditionally small</p>

	<p>apply it consistently and with confidence when determining planning applications.</p>		<p>forestry workers cottages. An occasional additional dwelling could be assimilated, but the density should remain extremely low. In riverside meadows settlement is typically absent.</p> <p>The Worcestershire Landscape Character Assessment Supplementary Guidance also notes that in areas of principle timbered farmlands, there has been a demise of the hedgerow structure, and that an organic pattern of enclosure should be preserved. In areas of principal wooded hills any changes to woodland cover should respect the historical significance of the old patterns of woodland clearance and ensure the conservation of these patterns along with boundary hedges. The Martley Conservation Area Appraisal and Management Strategy suggests in the Design Guidance for new Buildings and Extensions, that new boundary or dividing walls, railings or hedging should be built from suitable local materials or of native species and be designed into new developments to suit the character of the village.</p> <p>Consultations have shown that residents value trees and hedgerows as an important part of landscape character. Hedgerows are defined within the Hedgerows Regulations 1997 and trees covered by Tree Preservation Orders (TPOs) by Part 3 of the Town and Country Planning Act 1990 and the Town and Country Planning (Tree Preservation) (England) Regulations 2012.”</p> <p>Add further text to MKD1 (2):</p> <p>“In areas of principle timbered farmlands additional individual dwellings could be accommodated within the dispersed settlement pattern but they should not occur in sufficient density to convert the pattern to wayside or clustered status. Modern development favouring groups or clusters of new houses would not be</p>
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			<p>appropriate in this landscape. The landscape guidelines set out that the historic dispersed settlement pattern should be maintained.</p> <p>In areas of principle wooded hills occasional additional dwellings could be assimilated, but the density should remain extremely low.</p> <p>In riverside meadows settlement is typically absent and new development should be exceptional. The Landscape guidelines suggest building or road construction works should be avoided.”</p>
1.17	<p>MKD1(3) Boundary Treatments</p> <p>MKD1(3) encourages boundary treatments across the MKD neighbourhood area involving, where appropriate, hedges of native species, reclaimed brick or sandstone walls.</p> <p>The rationale for the MKD1(3) appears to be based on Martley Conservation Area Appraisal and Worcestershire Landscape Character Assessment (paragraph 4.15). Without more specific references, the policy could be considered aspirational and not supported by evidence.</p>	<p>Accepted.</p> <p>See 1.16 above.</p>	No further change.
1.18	<p>MKD1(4) Biodiversity, Habitats and Landscape Character Assessment</p> <p>The purpose of MKD1(4) is unclear. Is the purpose of MKD1(4) to protect sites of biodiversity interest or protect and</p>	<p>Noted.</p> <p>The purpose of MKD1(4) is to protect landscape character. Supporting local biodiversity is addressed in Policy MKD10.</p>	<p>Amend Plan.</p> <p>Amend Policy MKD1(4).</p> <p>Delete existing text of first paragraph and replace with:</p>

	<p>enhance local landscape character?</p> <p>If the intention of the policy is to protect local sites of biodiversity interest evidence to support the policy should be provided, together with a map identifying the sites.</p> <p>Alternatively, is MKD1(4) seeking to ensure that new development takes local landscape character into account in order to protect and enhance the 3 landscape characters covering the MKD area?</p> <p>If the purpose of the policy is to protect and enhance local landscape character it should be noted that the Framework says that the planning system should respond to local character (paragraph 58) and protect and enhance valued landscapes (paragraph 109). SWDP 25 (Landscape Character) says that development proposals must take account of the latest Landscape Character Assessment and its guidelines.</p> <p>Concerns about the Landscape Character Assessment element of MKD1(4) include:</p> <ul style="list-style-type: none"> • As the policy includes design guidelines for each of the 3 local character areas they may become dated when the 2012 Landscape Character Assessment is updated. 	<p>Reword the policy to improve clarity and add further information to the supporting text.</p>	<p>“Where appropriate, landscaping proposals in new development should take into account the latest Worcestershire Landscape Character Assessment and its guidelines in accordance with SWDP 25. The following landscape design guidelines should be incorporated into schemes where appropriate:</p> <p><u>In areas of principal timbered farmlands and wooded estatelands these are to:</u></p> <ul style="list-style-type: none"> • Maintain the tree cover character of hedgerow oaks, and enhance the age structure of the hedgerow oak population. • Conserve all ancient woodland sites and restock with locally occurring native species. • Seek to bring about coalescence of fragmented relic ancient woodlands (see Glossary). • Encourage the planting of new woodlands, reflecting the scale, shape and composition of the existing ancient woodland character, favouring oak as the major species. • Conserve and restore tree cover along water courses and stream lines. • Seek opportunities to enhance tree cover along highways and other non-farmed locations. • Conserve and restore the pattern and composition of the hedgerow structure through appropriate management, and replanting. • Conserve the organic pattern and character of the lane networks. • Maintain the historic dispersed settlement pattern. <p><u>In areas of principal wooded hills these are to:</u></p> <ul style="list-style-type: none"> • Conserve and restore the ancient broadleaved character of all woodlands.
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	<ul style="list-style-type: none"> • Planning Practice Guidance says that policies should be concise and precise. • The landscaping proposals are considered to be aspirations rather than policy and unlikely to be delivered as a result of development proposals. • It is not clear how the policy will be applied. <p>In brief, clear justification is required and the policy needs sufficient clarity for a decision maker to apply it consistently and with confidence when determining planning applications.</p>		<ul style="list-style-type: none"> • Seek to restore the wooded character of the area through large scale woodland planting in areas where the interlocking pattern has become diluted. • Conserve and restore the irregular pattern of assarted fields. • Strengthen the wooded character of hedgelines and stream lines through replanting or natural regeneration. • New woodland planting and felling coupes should be carefully designed to take particular account of their visual impact. <p>In areas of <u>riverside meadows</u> these are to:</p> <ul style="list-style-type: none"> • Seek to retain the unity of the linear form of these landscapes Conserve all existing areas of permanent pasture. • Seek opportunities to encourage the conversion of arable land back to pasture. • Conserve and enhance continuous tree cover along hedgelines, ditches and watercourses. • Conserve existing wetland habitats and seek opportunities for further wetland habitat creation. • Avoid building or road construction works. • Avoid further drainage of waterside meadows. • Explore opportunities to return to patterns and processes of natural flooding cycles. <p>In areas of <u>unenclosed commons</u>, these are to:</p> <ul style="list-style-type: none"> • Conserve and enhance the unenclosed visual distinctiveness of open common areas. • Conserve and enhance the spatial pattern, scale and specific character of wayside dwellings associated with commons.
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			<ul style="list-style-type: none"> • Seek to integrate wildlife benefit, current recreational interests and other uses, together with the historical interest.”
1.19	<p>MKD1(5) Mature and Established Trees</p> <p>MKD1(5) seeks to protect mature and established trees and retain existing hedgerows. The policy seeks to encourage the planting of native trees and hedges.</p> <p>The community’s desire to retain trees and hedgerows of arboricultural or amenity value is understood. However, the policy is very vague and would not provide clarity for decision makers.</p> <p>It should be noted that land use policies cannot seek to give general protection to trees unless they are part of development proposals.</p> <p>Currently, there is no supporting text for MKD1(5). The supporting text could make specific reference to the hedgerows defined within the Hedgerows Regulation 1997 and trees covered by TPO-Part 3 of the T &CP Act 1990 and the T&CP (Tree Preservation) (England) Regulations 2012.</p> <p>It is suggested that the policy could be re-</p>	<p>Accepted.</p> <p>Insert additional supporting text and amend the Policy as suggested.</p> <p>See 1.16 above.</p>	<p>Ref 1.16 - No further change to supporting text.</p> <p>Delete MKD1(5) and replace with: “Development that damages or results in the loss of ancient trees, or trees and hedgerows of arboricultural and amenity value, will be resisted. Proposals should be designed to retain such features.”</p>

	<p>worded along the following lines:</p> <p>Development that damages or results in the loss of ancient trees, or trees and hedgerows of arboricultural and amenity value, will be resisted. Proposals should be designed to retain such features.</p>		
1.20	<p>MKD1(6) Poly-tunnels, Glasshouses and Solar Farms</p> <p>MKD1(6) proposes that the visual impact of proposals for poly-tunnels, glasshouses and solar farms should be minimised.</p> <p>It should be noted that some poly-tunnels and glasshouses may be permitted development.</p> <p>In relation to solar farms, paragraph 4.16 signposts decision makers to National Planning Guidance and SWDP27 (Renewable and Low Carbon Energy), but otherwise the policy does not provide any policy guidance as to what factors need to be taken into account to minimise the impact of such proposals.</p> <p>The policy does not provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency.</p>	<p>Accepted.</p> <p>Provide additional supporting text and amend policy wording to add strength and clarity.</p>	<p>Amend Plan.</p> <p>Insert additional text to 4.18:</p> <p>“Paragraph: 013 Reference (ID: 5-013-20150327) of PPG sets out the particular planning considerations that relate to large scale ground-mounted solar photovoltaic farms. These include:</p> <ul style="list-style-type: none"> • encouraging the effective use of land by focussing large scale solar farms on previously developed and non-agricultural land. • where a proposal involves greenfield land, whether (i) the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land; and (ii) the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays. • that solar farms are normally temporary structures and planning conditions can be used to ensure that the installations are removed when no longer in use and the land is restored to its previous use. • the proposal’s visual impact, the effect on landscape of glint and glare. • the extent to which there may be additional impacts if solar arrays follow the daily movement of the sun. • the need for, and impact of, security measures such as lights and fencing; great care should be taken to ensure heritage assets are

			<p>conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting.</p> <ul style="list-style-type: none"> • the potential to mitigate landscape and visual impacts through, for example, screening with native hedges. <p>Many of these considerations may also be usefully applied to other large scale, visually intrusive forms of built development in the open countryside such as polytunnels and glasshouses.</p> <p>Insert additional text to MKD1 (6):</p> <p>“Where planning permission is required, particular attention should be given to the following:</p> <ul style="list-style-type: none"> • Encouraging the use of brownfield sites wherever possible, or land of lower agricultural value. • Consideration of visual impact of any structures, particularly on identified significant views (see Appendix I and Maps 8, 11 and 12) • Ensuring heritage assets are conserved in a manner appropriate to their significance, and considering any adverse impacts of proposals on views important to their setting. • Use of appropriate landscaping such as hedgerows to provide screening, and encouraging management of the site to enhance environmental and biodiversity wellbeing.”
1.21	<p>MKD1(7) Sustainable Drainage Systems</p> <p>MKD1(7) proposes that all new development incorporate SuDS.</p>	<p>Accepted.</p> <p>Amend wording as suggested.</p>	<p>Amend Plan.</p> <p>Delete MKD1(7).</p> <p>Insert additional text at the end of the Policy MKD1:</p>

	<p>It should be noted that SuDs cannot be incorporated into all development because suitability will depend on a number of factors including site size, topography and soil type.</p> <p>It is suggested that the rationale for SuDs is to minimise flood risk, rather than it being a landscape design issue.</p> <p>The link between MKD1(7) on page 33 and the justification in paragraph 4.11 on page 24 could be made clearer. It is noted that paragraph 4.11 helpfully makes the link to SWDP 29 (Sustainable Drainage Systems).</p>		<p>“Where possible, new development should incorporate Sustainable Drainage Systems which are fully compliant with the most recently adopted national and local standards, in order to minimise flood risk.”</p> <p>Amend para 4.11: Insert additional text: “The use of SuDS is promoted in Policy MKD1 as part of landscape design schemes.”</p>
1.22	<p>MKD1(8) Geographical and Local Landscape Features</p> <p>MKD1(8) seeks to protect 8 local landscape features and their settings from development, unless proposals aim to protect the feature or inform visitors.</p> <p>It is not clear what type of development this policy is seeking to address. Is it seeking to prevent development on the geological and landscape features, views from the features or views of the features?</p> <p>Clear justification is required and the policy needs sufficient clarity for a decision maker</p>	<p>Accepted.</p> <p>Amend policy wording to improve clarity.</p> <p>The justification is set out in paragraph 4.13.</p>	<p>Amend Plan.</p> <p>Amend MKD1(8) to:</p> <p>“The following significant local geological and landscape features and their settings are protected: Ankerdine Common, Berrow Hill, The Nubbins, The Millennium Green, Martley Rock, Penny Hill Quarry, Kingswood Weir, Rodge Hill (see Maps 6 and 7). Development on these sites will not be supported. Development which impacts on the setting of these sites or views towards them will be required to demonstrate that careful consideration has been given to design and siting, so that any adverse visual impacts are minimised. Such proposals should aim to protect the feature(s), and where possible incorporate information and interpretation facilities</p>

	to apply it consistently and with confidence when determining planning applications.		explaining the feature’s significance.”
1.23	<p>MKD1(9) Significant Views</p> <p>Policy MKD1(9) seeks to minimise the adverse impact of new development on 27 Significant Views identified in Appendix 1 and on Maps 8, 11 and 12).</p> <p>MKD1(9) appears to duplicate MKD1(1). The distinction between MKD(1) and MKD1(9) needs to be made clear.</p> <p>MKD1(9) is very broad, including “distant buildings” and is likely to be considered unreasonably protectionist.</p> <p>MKD1(1) does not provide a framework within which decisions on planning applications can be made with a high degree of predictability and efficiency.</p> <p>Please see earlier comments relating to MKD1(1)</p>	<p>Accepted.</p> <p>Amend policy to improve clarity and reduce repetition.</p>	<p>Amend Plan.</p> <p>Amend MKD1:</p> <p><u>Delete MKD1(9).</u></p> <p>Amend MKD1(1) to:</p> <p>“The key features of any Significant Views can continue to be enjoyed, including distant buildings, natural features, features of importance, areas of landscape, and the juxtaposition of settlement edges and open countryside. Significant Views are identified in Appendix 1 and are shown on Maps 8, 13 and 14. Development which impacts on these views will only be supported where the scheme is sited and designed sensitively, and development is of an appropriate scale, to ensure that the key features are not unduly obscured.”</p>
5.0 Built Heritage			
<p>MKD2</p> <p>1.24</p>	<p>Policy MKD2 seeks to preserve and enhance the character and appearance of the Martley Conservation Area.</p> <p>The 5 design principles in MKD2 are</p>	<p>Noted.</p>	<p>No change.</p>

	consistent with the Martley Conservation Area Appraisal and Management Strategy (2006).		
1.25	<p>In addition to the 5 principles listed in MKD2, the 2006 Appraisal and Management Strategy includes a further principle which, for consistency, could be included in the policy:</p> <p>Development proposals that would result in the demolition of a building or structure if its loss would be harmful to the character of the Conservation Area will not be supported.</p> <p>As context, the 2006 Appraisal and Management Strategy helpfully says that “a Conservation Area is not intended to preserve its component buildings, spaces, trees and other components in aspic. It cannot live in the past, rejecting all modern comforts and conveniences, but should be a living, organic whole, adapting to modern life and adopting the best of the new whilst retaining the essential character of the old and loved.”</p>	<p>Accepted.</p> <p>Add further text to Policy MKD2 as suggested.</p>	<p>Amend Plan.</p> <p>Amend MKD2.</p> <p>Insert additional point to text: “Development proposals that would result in the demolition of a building or structure if its loss would be harmful to the character of the Conservation Area will not be supported.”</p>
1.26	It is considered that the Martley Conservation Area Appraisal continues to sit comfortably with national policy and guidance given that the underlying requirement for conservation areas is the	Noted.	No change.

	preservation or enhancement of character and appearance.		
1.27	<p>However, it should be noted that some of the detailed guidance may not be enforceable through planning control.</p> <p>For example, MKD2(2) says local materials or vernacular techniques should be used.</p> <p>Insisting on vernacular techniques is not subject to general planning control and would probably be difficult to insist upon even in a listed building proposal.</p> <p>Also, it would be unfortunate if the statement “extensions should always be in materials sympathetic to the main building” only ever resulted in support for schemes which used traditional materials in a ‘safe’ manner as opposed to good quality, modern materials in an innovative or challenging design which nevertheless still complements those qualities which contribute to character and appearance.</p>	<p>Accepted.</p> <p>Amend Plan.</p>	<p>Amend Plan.</p> <p>Amend MKD2(2) to: “New buildings or extensions should reflect the overall pattern of buildings within and around the setting of the Conservation Area, in terms of size and scale, form, proportion and detailing. Use of local materials is encouraged. However, good quality, modern materials used in an innovative or challenging design which complements those qualities which contribute to character and appearance will also be acceptable. Extensions should be in materials sympathetic to the main building.”</p>
1.28	<p>MKD2(4) relates to important views, open spaces, trees etc within the Conservation Area. It should be noted that not every view will be of equal importance in conservation area terms.</p>	<p>Partially accepted.</p> <p>The Steering Group / Parish Council do not accept the suggested insertion that not every view will be of equal</p>	<p>Amend Plan.</p> <p>Insert additional text to 5.3: “Significant views are also identified.”</p> <p>Amend MKD2(4) to:</p>

	<p>It is suggested that MKD2(4) links to Map 8 (Martley Conservation Area), not MKD1. It is also suggested that Map 8 needs to be clearer so that the text in the key is readable.</p>	<p>importance in conservation area terms.</p> <p>Amend text as suggested.</p>	<p>“Proposals should retain significant views and open spaces, trees and hedgerows or boundary features that are within the Conservation Area or affect its setting (see Map 8).”</p> <p>Replace Map 8 with better quality map.</p>
<p>Policy MKD3 Building Design Principles Outside Martley Conservation Area</p> <p>1.29</p>	<p>Policy MKD3 seeks to establish design principles for all new development outside of the Martley Conservation Area.</p> <p>The Government is seeking to support high quality design in all new development. The thrust of intention behind MKD3 therefore has regard to the Framework.</p> <p>Paragraph 59 of the Framework says that design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.</p> <p>Paragraph 60 of the Framework says that planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It</p>	<p>Noted.</p>	<p>No change.</p>

	is, however, proper to seek to promote or reinforce local distinctiveness.		
1.30	<p>Paragraph 5.10 says that two recent estates (St Peter's and Crown Meadow) were built from building firm pattern books using standardised designs and materials which clash with those typical in MKD.</p> <p>Readers are then invited to see montages in Figure 15 (on pages 40 - 42). It is not clear whether the photographs show materials and architectural styles which the local community does, or does not, want to see in MKD. Any design guidance in the neighbourhood plan should be positive and provide examples of what the parish wishes to encourage.</p>	<p>Accepted.</p> <p>Amend text as suggested.</p>	<p>Amend Plan.</p> <p>Delete text in 5.10: "The two recent housing estates (St Peter's and the Crown Meadow) were built from building firm pattern books, using standardised designs and materials which clash with those typical for the Area (see the following montages in Figure 15)."</p> <p>Insert new text: "The following montages in Figure 15 illustrate the materials and architectural features which are typical of buildings in the neighbourhood area. These architectural details, designs and styles make a positive contribution to local character and new development should aim to respond positively to the existing built form of the surrounding area."</p>
1.31	MKD3(1) refers to a "Statement of Design Principles". It is not clear where the Statement can be found or how it was derived.	<p>Noted.</p> <p>Amend text to improve clarity.</p> <p>The Statement of Design Principles refers to any design and access statement submitted with a planning application.</p>	<p>Amend Plan.</p> <p>Amend MKD3 (1):</p> <p>Delete: "within the Statement of Design Principles"</p>
1.32	MKD3(3) includes some repetition with MKD3(1) and MKD3(2) e.g. references to scale and materials.	<p>Noted.</p> <p>Amend Policy to reduce repetition.</p>	<p>Amend Plan.</p> <p>Amend MKD3 (3):</p>

	<p>What is the justification for encouraging housing to be built from “natural materials” from “environmentally-responsible sources”, using “energy saving materials”, and “materials of high quality which have been reclaimed, salvaged or recycled”?</p>	<p>The justification for promoting natural materials etc is that such techniques contribute towards sustainable development.</p>	<p>Delete: New buildings and all building alterations or extensions must be sensitive to the local context in terms of materials, design, colour scheme, scale and structure.</p> <p>Add additional text to 5.11:</p> <p>“The use of technologies and design which support energy efficiency in buildings is supported as part of an overall approach within the NDP to contribute towards more sustainable development.”</p>
1.33	<p>MKD3(4) proposes that development proposals at historic farmsteads and agricultural buildings should have regard to the Worcestershire Farmstead Assessment Framework (WFAF).</p> <p>Does the policy relate to agricultural buildings associated with historic farmsteads or does it relate to all agricultural buildings?</p> <p>If the policy relates to historic farmsteads it would be helpful if these were listed in an Appendix and / or shown on a map. The policy should also provide a web link to the WFAF.</p>	<p>Noted.</p> <p>The policy relates to historic farmsteads.</p>	<p>Amend Plan.</p> <p>Amend MKD3(4) to:</p> <p>“Redevelopment, alteration or extension of historic farmsteads (see Map 15 in Appendix II) must be sensitive to their distinctive character, materials and form. Due reference and consideration should be made to the Worcestershire Farmstead Assessment Framework”</p> <p>(insert reference: http://www.worcestershire.gov.uk/info/20230/archive_and_archaeology_projects/1023/historic_farmstead_characterisation).”</p> <p>Refer to Historic Farmsteads Project and Maps in supporting text.</p>
1.34	<p>MKD3(5) is considered to be very vague and does not provide a framework within which decisions on planning applications can be made with a high degree of predictability and efficiency.</p>	<p>Accepted.</p> <p>This could be deleted as residential amenity issues are largely covered in the SWDP eg</p>	<p>Amend Plan.</p> <p>Delete MKD3(5).</p>

		SWDP4: Moving around South Worcestershire, SWDP 21: Design etc.	
1.35	MKD3(6) seeks to minimise street lighting. Whilst the desire to keep light pollution to a minimum is acknowledged, the provision of street lighting is not a matter controlled by a Neighbourhood Plan	Not accepted. This guideline is for lighting schemes generally and should be included in the NDP to encourage schemes to be designed appropriately and protect the dark skies.	No change.
1.36	MKD3(7) proposes that driveway and entrance gates should be of traditional wooden or metal field design, such as five-bar gates. It is suggested that this is very prescriptive. There does not appear to be any evidence to support the proposal.	Accepted. The policy could be amended to reduce prescriptiveness.	Amend Plan. Amend MKD3(7): Delete: “such as ‘five bar’ gates”
1.37	MKD3(8) proposes that extensions to existing dwellings are subordinate in scale to the original building. MKD3(8) is largely duplicated in MKD7(d).	Accepted. Delete point to reduce duplication.	Amend Plan. Delete MKD3(8): Extensions to properties should be of a subordinate scale to the original building.
Non Land Use Policy – Action for the Parish Council - Martley Conservation Area			
Parish Councils’ Action 1 - Martley Conservation Area	Planning Practice Guidance says that wider community aspirations than those relating to development and use of land can be	Noted.	No change.

<p>1.38</p>	<p>included in a neighbourhood plan, but actions dealing with non land use matters should be clearly identifiable. For example, set out in a companion document or annex.</p> <p>The aspiration to extend the boundary of the Martley Conservation Area is included in the body of the Neighbourhood Plan but is clearly labelled as an Action for the Parish Councils and shaded in a different colour to distinguish it from the land-use policies.</p> <p>The Parish Council's recommend that Malvern Hills District Council extend the boundary of Martley Conservation Area to include the Nubbins escarpment.</p> <p>Conservation Areas were established by the 1967 Civic Amenities Act and were defined as being areas of "special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance".</p> <p>Martley was designated as a Conservation Area in 1981. The Conservation Area boundaries were reviewed and re-drawn in 2006.</p> <p>It should be noted that conservation areas</p>		
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	<p>are 'areas of special architectural or historic interest', they are not landscape protection designations.</p> <p>In relation to the Martley Conservation Area, it is considered that the focus would have to be on the historic association or relationship of the Nubbins with the built historic core of Martley.</p> <p>As background, there are cases where traditional remnant orchards have been included within conservation area boundaries where the settlements historic evolution within a wider fruit growing landscape has been demonstrated.</p> <p>Similarly, ridge and furrow land has been included in a conservation area where it adjoins the historic built settlement and there is evidence of its association with the historic development of the settlement.</p> <p>Such areas would not been included within a conservation areas if by doing it would include significant areas of land and buildings which do not adjoin the historic built settlement or could not demonstrate sufficient historic or architectural interest.</p>		
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Non Land Use Policy – Action for the Parish Council - Area of Outstanding Natural Beauty		
<p>Parish Councils’ Action 2 - Area of Outstanding Natural Beauty</p> <p>1.39</p>	<p>Planning Practice Guidance says that wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but actions dealing with non land use matters should be clearly identifiable. For example, set out in a companion document or annex.</p> <p>The aspiration to extend the boundary of the Malvern Hills AONB is included in the body of the Neighbourhood Plan but is clearly labelled as an Action for the Parish Councils and shaded in a different colour to distinguish it from the land-use policies.</p> <p>The MKD Parish Councils recommend that Malvern Hills District Council prepare a bid to Natural England to extend the boundary of the Malvern Hills AONB to include an ex-County Council designation, the Teme Valley Area of Great Landscape Value (AGLV).</p> <p>AONB’s are national designations. Natural England has the power to designate AONB’s under the Countryside and Rights of Way Act 2000. AONB is not a local designation, it is of national significance.</p>	<p>Noted.</p> <p>Amend Plan.</p> <p>Insert “former” before “Teme Valley” in line 2.</p>

	<p>The AGLV designation was a County Council designation, not a national one. The AGLV classification no longer exists. It would have been drawn up with different criteria to the AONB, and therefore cannot simply be converted to AONB status. It is considered that a strong case would have to be made to Natural England to see this as a national priority for assessing the merits of the area for a further AONB designation.</p> <p>The proposed Parish Council Action does not include evidence that the ex-AGLV designation meets AONB criteria.</p>		
<p>Policy MKD4 Protecting Local Heritage Assets and Archaeology</p> <p>1.40</p>	<p>Policy MKD4 appears to be seeking to achieve two separate objectives:</p> <ul style="list-style-type: none"> - to protect non-designated heritage assets on the MHDC Local List and - requiring all new development to take account of known surface and sub-surface archaeology. <p>It is suggested that the two issues would be better addressed in separate policies.</p>	<p>Accepted.</p> <p>Amend MKD4 – split into 2 policies.</p>	<p>Amend Plan.</p> <p>Amend MKD4.</p> <p>Delete text in title “and Archaeology”</p> <p>Delete last paragraph:</p> <p>New development must take account of known surface and sub-surface archaeology, and ensure unknown and potentially significant deposits are identified and appropriately considered during development. Lack of current evidence of sub-surface archaeology must not be taken as proof of absence.</p>
1.41	Non-Designated Heritage Assets	Amend Plan.	Amend Plan.

	<p>Heritage assets are an irreplaceable resource, which are protected by national legislation and policy. Policy MKD4 rightly distinguishes between designated heritage assets (such as listed buildings and conservation areas) and non-designated heritage assets.</p> <p>Reference could usefully be made to Section 7 of the NPPF (Conserving and enhancing the historic environment) and SWDP 6 (Historic Environment) and SWDP 24 (Management of the Historic Environment).</p> <p>The aspiration to identify non-designated heritage assets through the neighbourhood plan process is appropriate. However, it is suggested that the link between Policy MKD4 and the Local List SPD could be strengthened.</p> <p>As background, there are a number of buildings / assets within the parish that have local heritage value which may not be appropriate for national listing, but could be locally listed. The Local List will be designated and maintained by Malvern Hills District Council, but it would be appropriate for the Parish Council to nominate non-designated heritage assets for consideration in the MHDC Local List</p>	<p>Insert additional supporting text as suggested.</p>	<p>Delete para 5.13 and replace with:</p> <p>“Section 7 of the NPPF Conserving and enhancing the historic environment, and SWDP 6 Historic Environment and SWDP 24 Management of the Historic Environment support and promote the protection of non-designated heritage assets.</p> <p>There are a number of buildings and assets within the Parishes that have local heritage value and which whilst that may not be appropriate for national listing, could be locally listed. The proposed Local List will be designated and maintained by Malvern Hills District Council, but it would be appropriate for the Parish Council to nominate non-designated heritage assets for consideration in the MHDC Local List SPD. As non-designated heritage assets, these buildings would be afforded some protection through local planning policy.</p> <p>Proposed non-designated heritage assets will have to meet the necessary criteria. The Local List SPD sets out that local heritage assets will need to be significant with regard to at least one of the following: a significant period in the District’s history; the social history of the District; or a notable example of planned or incidental planning; or associated with an individual of local importance. In addition, a nominated asset will need to be significant having regard to one or more of the following: age, rarity, aesthetic value, group value, evidential value, archaeological interest, designed landscape, landmark status and social/communal value. Policy MKD4 seeks to protect those local heritage assets which will be identified as through a process led by Parish Council, working closely with Malvern Hills District Council.”</p> <p>Insert additional point as an Action for Parish Councils:</p>
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	<p>SPD through the neighbourhood plan process. As non-designated heritage assets these buildings would be afforded some protection through local planning policy. It is suggested that the Parish Councils could seek to identify proposed non-designated heritage assets in an Appendix 2 - Heritage Assets under Consideration for Local Listing.</p> <p>If the Parish Councils wish to propose non-designated heritage assets it will be important to ensure that they meet the necessary criteria. The Local List SPD says that local heritage assets will need to be significant with regard to at least one of the following - a significant period in the District's history, the social history of the District or a notable example of planned or incidental planning or associated with an individual of local importance. In addition a nominated asset will need to be significant having regard to one or more of the following – age, rarity, aesthetic value, group value, evidential value, archaeological interest, designed landscape, landmark status and social / communal value. It would also be helpful if there was a photograph of any proposed heritage assets.</p>		<p>“Parish Councils’ Action 3 Preparation of a Local List of Heritage Assets</p> <p>The Parish Councils will work to prepare a list of heritage assets which are not designated on the Statutory List of Buildings of Special Architectural or Historic Interest. These will be forwarded for consideration by MHDC for inclusion in the Local List Supplementary Planning Document (SPD). “</p>
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1.42	<p>It is suggested that the first two paragraphs of Policy MKD4 could be re-drafted along the following lines:</p> <p>Proposals requiring consent which affect a building or structure on the Local List must demonstrate how they protect or enhance the heritage asset.</p> <p>The renovation or alteration of buildings or structures identified on the local heritage list should be designed sensitively, and with careful regard to the heritage asset’s historical and architectural interest and setting.</p>	<p>Accepted.</p> <p>Amend Policy as suggested.</p>	<p>Amend Plan.</p> <p>Delete first 2 paragraphs of MKD4 and replace with: “Proposals requiring consent which affect a building or structure on the Local List must demonstrate how they protect or enhance the heritage asset.</p> <p>The renovation or alteration of buildings or structures identified on the local heritage list should be designed sensitively, and with careful regard to the heritage asset’s historical and architectural interest and setting.”</p>
1.43	<p>Archaeology</p> <p>Policy MKD4 requires all new development to take account of known surface and sub-surface archaeology. In planning policy it is important to discern between “must” (a policy requirement) and “should” (to be applied in appropriate circumstances). For policy MKD4, it is suggested that “must” is changed to “should”.</p>	<p>Noted.</p> <p>This policy is supported by Historic England.</p>	<p>This is now a new Policy MKD5 – see 1.45 below.</p>
1.44	<p>Currently, there is no supporting text for Policy MKD4. The policy would benefit from the inclusion of a reasoned justification.</p>	<p>Accepted.</p> <p>Insert additional supporting text and new map as suggested.</p>	<p>Amend Plan.</p> <p>Amend MKD4.</p>

	<p>The Framework (paragraph 128) says that where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</p> <p>SWDP 24 (Management of the Historic Environment) says that where proposals are likely to affect heritage assets with archaeological interest they should be accompanied by a description informed by available evidence, desk-based assessment and, where appropriate, field evaluation to establish the significance of known or potential heritage assets.</p> <p>As currently worded, Policy MKD4 requires all development, irrespective of size and location, to take account of archaeology and does not say how this should be achieved. It is considered that the policy does not provide a framework by which decisions can be made with a high degree of predictability and efficiency and the requirement may not be proportionate to the likelihood of unidentified heritage assets being discovered.</p>		<p>Insert additional supporting text before Policy:</p> <p>“The NPPF (Paragraph 128) sets out that where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation. SWDP 24 Management of the Historic Environment advises that where proposals are likely to affect heritage assets with archaeological interest they should be accompanied by a description informed by available evidence, desk-based assessment and, where appropriate, field evaluation to establish the significance of known or potential heritage assets. Maps from Worcestershire Archive and Archaeology Service Historic Environment Record (HER) identifying known heritage assets with archaeological interest are provided on the neighbourhood plan website (see http://www.martley-pc.org.uk/index.php/neighbourhood-plan/data) and these assets are protected in MKD5 Archaeology.”</p>
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	It is suggested that a map showing sites of known archaeological interest be included in the neighbourhood plan to assist applicants and decision makers.		
1.45	<p>It is suggested that the third paragraph of Policy MKD4 could be replaced with wording along the following lines:</p> <p>Development proposals in areas shown on Map X should take account of known surface and subsurface archaeology and ensure unknown and potentially significant deposits are identified and appropriately considered during development.</p> <p>In all instances the Worcestershire Historic Environment Record should be consulted at an early stage in the formulation of proposals.</p>	<p>Accepted.</p> <p>Amend MKD4 as suggested.</p>	<p>Amend Plan.</p> <p>Provide new Policy MKD5 Protecting Archaeology.</p> <p>“Development proposals in areas shown on Map 9 should take account of known surface and subsurface archaeology and ensure unknown and potentially significant deposits are identified and appropriately considered during development.</p> <p>In all instances the Worcestershire Historic Environment Record should be consulted at an early stage in the formulation of proposals.”</p>
6.0 Settlement Pattern and Housing			
<p>Policy MKD5 Maintaining the Settlement Pattern in Martley, Knightwick and Doddenham</p> <p>1.46</p>	<p>Policy MKD5 seeks to ensure that the existing settlement pattern of “scattered buildings with open spaces, varied styles and irregular layouts” is maintained.</p> <p>The intention to maintain existing patterns (or lack of them) is laudable in principle, but in practice the policy does not provide a practical framework within which</p>	<p>Noted.</p>	<p>No change.</p>

	<p>decisions on planning applications can be made with a high degree of predictability and efficiency.</p> <p>Maintaining the existing settlement pattern may have merit in landscape terms, but other dimensions of sustainable development (economic and social) may also be relevant.</p>		
1.47	<p>The policy seems to relate to development in and around the development boundary rather than the three parishes generally. Is this the case?</p>	<p>Noted. The Policy relates to all three Parishes.</p>	<p>No change.</p>
1.48	<p>In essence, MKD5 appears to be proposing that all new development should enhance and reinforce the local distinctiveness of the local area and should be of a scale, mass and built form which responds to the characteristics of the site and its surroundings.</p>	<p>Noted.</p>	<p>No change.</p>
1.49	<p>MKD5(1) proposes that new developments must be less than 6 dwellings.</p> <p>What is the evidence to support the maximum 5 dwelling threshold? If all new developments are required to be a maximum of 5 dwellings then there will only ever be a maximum of 1 affordable dwelling on a site (based on SWDP 14), and with most developments it would be a</p>	<p>Noted.</p> <p>The supporting text in para 6.2 explains that buildings are scattered across the Parishes.</p>	<p>No change.</p>

	financial contribution.		
1.50	<p>MKD5 relates to all new development, but MKD5(1) appears to relate specifically to housing. Is this what is intended?</p> <p>Does MKD5(1) also relate to other development - e.g employment, leisure, solar farms etc? In relation to housing, it is suggested that the word “dwelling” is used (which can also cover flats, conversions etc)</p>	<p>Noted.</p> <p>MKD5 relates to housing. Amend text to add clarification.</p>	<p>Amend Plan.</p> <p>Amend MKD5.</p> <p>Insert “housing” after “All” in first line.</p> <p>Replace “buildings” in second line with “dwelling”.</p> <p>Note new numbering.</p>
1.51	<p>MKD5(2) says new developments must be fully integrated into the existing settlement through layouts that promote “permeability”. It is not clear what this means.</p>	<p>Accepted.</p> <p>Include definition of permeability in a footnote.</p>	<p>Amend Plan.</p> <p>Insert a definition of “permeability” in a footnote / glossary.</p> <p>“Permeability is the extent to which urban forms permit (or restrict) movement of people or vehicles in different directions”</p>
1.52	<p>MKD5(3) says that proposals that result in the loss of open spaces will not be supported. It is suggested that a definition of open spaces is included in a glossary using the NPPF glossary definition.</p>	<p>Accepted.</p> <p>Insert definition of open spaces in a footnote.</p>	<p>Amend Plan.</p> <p>Insert definition of open spaces in a footnote / glossary.</p> <p>“Open space is defined in the NPPF as all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.”</p>
MKD6 New Housing Development in Martley village	<p>Policy MKD6 seeks to support new development within the village development boundary, providing it is on previously developed land (or the</p>	<p>Noted.</p>	<p>No change.</p>

1.53	<p>conversion, re-use or extension of an existing building).</p> <p>The justification for MKD6 is provided in paragraphs 6.7 to 6.11. Some of the statements in these paragraphs are not strictly accurate:</p>		
1.54	<p>Paragraph 6.7 – it would be more accurate to say that SWDP 2 focuses most development on the urban areas where both housing needs and accessibility to lower-cost public services are greatest.</p> <p>SWDP 2B says windfall development proposals will be assessed in accordance with the settlement hierarchy. Martley is identified as a Category 1 settlement in the hierarchy and Knightwick is a Category 3 settlement. The role of Category 1, 2 and 3 settlements in the SWDP is predominately aimed at meeting locally identified housing and employment needs. SWDP 2, Table 2 says that infill development within the defined development boundaries is acceptable in principle subject to more detailed Plan policies.</p>	<p>Accepted..</p> <p>Amend para 6.7 as suggested.</p>	<p>Amend Plan.</p> <p>Amend para 6.6. Add “14 on the Orchard site behind the bungalows on the Worcester Road” after “Great Whitley Road”.</p> <p>Amend para 6.7: Delete paragraph 6.7 from “The SWDP directs.....”</p> <p>Replace with: “SWDP 2 focuses most development on the urban areas where both housing needs and accessibility to lower-cost public services are greatest. SWDP 2B sets out that windfall development proposals will be assessed in accordance with the settlement hierarchy. Martley is identified as a Category 1 settlement in the hierarchy and Knightwick is a Category 3 settlement. The role of Category 1, 2 and 3 settlements in the SWDP is predominately aimed at meeting locally identified housing and employment needs. SWDP 2, Table 2 sets out that infill development within the defined development boundaries is acceptable in principle subject to more detailed Plan policies.</p> <p>The existing development boundary for Martley as set out in the adopted SWDP has been used as the basis for the development</p>

			<p>boundary in Martley, but this has been amended. The boundary of sites allocated for development outside and adjoining the existing development boundary (including site allocations on land adjacent to the Crown) form the basis of an extension to the existing development boundary.</p> <p>The Objectively Assessed Housing Need (OAHN) to 2030 in South Worcestershire is 28,370 dwellings. The SWDP makes provision for around 28,400 dwellings to meet this need, including 65 in Martley (51 on land adjacent to The Crown and 14 on land adjacent to the Primary School). In addition, there have been further planning approvals for 39 dwellings in Martley since 2013/14. In light of this, it is considered that there is no immediate need to identify sites for further development in Martley Knightwick and Doddenham within the Neighbourhood Plan.”</p>
1.55	<p>Paragraphs 6.8 and 6.9 – following the adoption of the SWDP, references to the Malvern Hills District Plan are now redundant.</p>	<p>Accepted.</p> <p>Amend text as suggested.</p>	<p>Amend Plan.</p> <p>Delete para 6.8 and 6.9.</p>
1.56	<p>Paragraphs 6.9 and 6.10 - following the adoption of the SWDP, the boundary to sites allocated for development outside and adjoining an existing settlement boundary (including site allocations on land adjacent to the Crown) form the basis of an extension to the existing development boundary. Where a housing allocation is not coterminous with the development boundary (including SWDP 59k – land adjacent to the Primary School), it is not included in the boundary</p>	<p>Accepted.</p>	<p>No further change.</p> <p>Insert new text for 6.8 – see 1.54 above.</p>

1.57	Paragraph 6.10 – it is suggested that the 1 st and 2 nd sentences are assertions at this stage and should be deleted.	Not accepted. This text supports and explains the NDP strategy.	No change.
1.58	The 4 th sentence is covered by the above comments relating to the settlement boundary	Accepted. Delete 4 th sentence as suggested.	Amend Plan. Amend para 6.10 – delete 4 th sentence.
1.59	<p>Paragraph 6.11 – says that “‘Affordable’ to most people meant houses that could be afforded by people on average or below average incomes, rather than the official definition of 80% of market value.”</p> <p>This appears to be confused with the term “affordable RENT” which is defined as 80% of market RENT, not market value. Social housing is not defined this way. Please note that the official definition of affordable housing is in the NPPF and SWDP Glossaries.</p>	Accepted. Amend para 6.11.	<p>Amend Plan.</p> <p>Amend para 6.11.</p> <p>Delete “rather than the official definition of 80% of market value.”</p> <p>Insert: “For a definition of Affordable Housing please see Glossary in Appendix III”.</p> <p>Insert NPPF definition into Glossary:</p> <p>“Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market.</p> <p>Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.</p> <p>Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are</p>

			<p>determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.</p> <p>Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing.</p> <p>Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).</p> <p>Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.</p> <p>Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes.”</p>
1.60	<p>As an introduction to the section on Housing Need (paragraph 6.7) it may be helpful to say that the Objectively Assessed Housing Need (OAHN) to 2030 in south Worcestershire is 28,370 dwellings.</p> <p>The SWDP makes provision for around 28,400 dwellings to meet this need, including 65 in Martley (51 on land adjacent to the Crown and 14 on land adjacent to</p>	<p>Accepted.</p> <p>Insert additional text as suggested.</p>	<p>Amend Plan.</p> <p>Change subheading to Housing Need</p> <p>Insert additional text to para 6.7:</p> <p>“The Objectively Assessed Housing Need (OAHN) to 2030 in South Worcestershire is 28,370 dwellings. The SWDP makes provision for around 28,400 dwellings to meet this need, including 65 in Martley (51 on land adjacent to The Crown and 14 on land adjacent to the</p>

	the Primary School). In addition there have been further planning approvals for 14 dwellings in Martley since 2013/14. In light of this, it is considered that there is no immediate need to identify sites for further development in MKD within the Neighbourhood Plan.		Primary School). In addition, there have been further planning approvals for 39 dwellings in Martley since 2013/14. In light of this, it is considered that there is no immediate need to identify sites for further development in Martley, Knightwick and Doddenham within the Neighbourhood Plan”
1.61	Paragraph 6.11 suggests a lack of local support for the Crown Meadow development. It is suggested that the plan positively focuses on the future, not the past.	Accepted. Delete reference to Crown Meadow development.	Amend Plan. Amend Para 6.11: Delete “(such as the 51 dwellings now completed at Crown Meadow in Martley)”
1.62	Map 10 shows the proposed revised settlement boundary for Martley. It is noted that the proposed settlement boundary differs quite significantly from that in the SWDP. The proposed settlement boundary includes the SWDP 59/12 allocation (land adjacent to the Crown) but also includes: Properties to the west of Hastings Close Developed land to the west of the SWDP 59/12 allocation and granted planning permission to the east of the B4197 opposite Bank House (planning application 14/00572/FUL)	Noted.	No change.

	<p>lot of land to the north of the Old Granary</p> <p>The SWDP 59k allocation (land adjacent to the Primary School) and existing properties at The Orchards to the north of SWDP 59k. The reason SWDP 59k was not included in the SWDP settlement boundary is because it does not adjoin the existing settlement boundary.</p>		
1.63	<p>It would be helpful if the supporting text provided an explanation of the proposed revisions to the settlement boundary. Is the purpose of extending the settlement boundaries to allow for further housing growth in addition to existing commitments? If so, it would be helpful to make this more explicit.</p>	<p>Accepted.</p> <p>Insert additional text explaining the proposed settlement boundaries.</p>	<p>Amend Plan.</p> <p>See 1.54 above – no further change.</p>
1.64	<p>Policy MKD6 provides some flexibility for development within the development boundary. However, it is considered that restricting infill development to previously developed land may be too restrictive. It should be noted that it is more restrictive than SWDP 2B (Development Strategy and Settlement Hierarchy).</p>	<p>Accepted.</p> <p>Amend text as suggested.</p>	<p>Amend Plan:</p> <p>Amend MKD6(a):</p> <p>Delete: “on previously developed land”</p> <p>Note new numbering.</p>
Policy MKD7 New Housing Development Outside the	<p>Policy MKD7 seeks to strictly control housing development in the open countryside. The policy provides flexibility for new development for use by rural</p>	<p>Noted.</p>	<p>No change.</p> <p>Note new numbering.</p>

<p>Martley Settlement Boundary</p> <p>1.65</p>	<p>workers, rural exception sites, replacement dwellings, house extensions and conversions.</p> <p>Policy MKD7 provides a clear local interpretation of SWDP 2C as it relates to housing development in the open countryside.</p>		
<p>1.66</p>	<p>It is suggested that Policy MKD7 d) and e) be decoupled from MKD7 a) to c) because extensions and conversions are not new housing development – i.e. after MKD7 c) there would be separate paragraphs relating to extensions and conversions:</p> <p>Extensions to existing dwellings will be supported providing that they are subordinate to, and do not dominate the character and appearance of the original dwelling.</p> <p>Conversions or the re-use of existing buildings will be supported providing there is no need for substantial reconstruction or need for large extensions.</p>	<p>Accepted.</p> <p>Amend MKD7 as suggested.</p>	<p>Amend Plan.</p> <p>Amend MKD7 to read: “New housing development in the open countryside, outside the Martley village development boundary (Map 3), will be only supported when it is:</p> <ol style="list-style-type: none"> 1. A dwelling clearly necessary for use by rural workers including persons employed in agriculture, horticulture, forestry or a rural enterprise; or 2. Affordable housing on an exception site to meet identified local need; or 3. A replacement of an existing dwelling with established use rights and where the replacement dwelling does not exceed the original footprint by 30%; and 4. It accords with other relevant policies in the Martley Knightwick and Doddenham Neighbourhood Plan and South Worcestershire Development Plan. <p>Extensions to existing dwellings will be supported, providing that</p>

			<p>they are subordinate to, and do not dominate the character and appearance of the original dwelling. Conversions or the re-use of existing buildings will be supported providing there is no need for substantial reconstruction or need for large extensions.”</p> <p>Note new numbering.</p>
1.67	For consistency with Policy MKD6 it suggested that Policy MKD7 add “d) It accords with other relevant policies in the MKD Neighbourhood Plan and South Worcestershire Development Plan.”	<p>Accepted.</p> <p>Insert additional point d) to MKD7.</p>	<p>Amend Plan.</p> <p>No further change – see 1.66 above.</p>
<p>Policy MKD8 Housing Mix</p> <p>1.68</p>	Policy MKD8 encourages proposals that provide a range of housing sizes, types and tenures without setting out what specific mix would be required. In particular, the policy encourages 1 or 2 bedroom dwellings for first time buyers / small families, dwellings for the elderly and plots for self build.	Noted.	No change.
1.69	<p>The policy indicates that <u>all</u> housing development should contribute towards a mix of housing types, sizes and tenures. In practice, however, the policy will only be relevant to sites where it is intended to build a group of dwellings, particularly plots for self-build.</p> <p>It should be noted that SWDP 14 (Market Housing Mix) only relates to developments of 5+ dwellings (and Policy MKD5 proposes</p>	<p>Accepted.</p> <p>Amend Plan as suggested.</p>	<p>Amend Plan.</p> <p>Amend MKD8: Change “All new housing development” to: “New housing development schemes of 5 or more dwellings..”</p> <p>Note new numbering.</p>

	<p>the new developments be a maximum of 5 dwellings).</p> <p>As currently worded, it is considered that the policy is insufficiently precise to provide clarity for prospective developers and decision makers.</p>		
1.70	<p>It is suggested that the supporting text should make reference to paragraph 50 of the Framework which advocates planning for a mix of housing need.</p>	<p>Accepted.</p> <p>Insert additional text to supporting text para 6.17 as suggested.</p>	<p>Amend plan.</p> <p>Insert additional text to para 6.17 onwards:</p> <p>“Paragraph 50 of the NPPF encourages planning authorities to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. To do this, local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand and where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified.</p> <p>Paragraphs 1.3.2 and 1.3.3 of the NDP note that the ONS has estimated that the population aged 65 years and over in Malvern Hills District will rise by 53% between 2012 and 2030, and that the population aged 80 years and over will rise by 139% over the same</p>

			<p>period. Paragraph 1.2.3 notes that the population of the neighbourhood area has a similar age profile to that of the District as a whole, and it is therefore reasonable to expect a similar proportionate growth in the elderly population of Martley, Knightwick and Doddenham. One consequence of this trend is under-occupancy. ONS data (ref: CT0101 – Age by occupancy rating (bedrooms) by tenure, 8 October 2013) indicates that over half of people of 65 years and above living in owner-occupied dwellings have two or more spare bedrooms. Surveys of elderly people have identified a considerable unmet demand for smaller and more adapted housing.¹ An additional factor in rural areas is the need for elderly people to move to village centres so as to be closer to shops, public transport and primary healthcare while maintaining links within their own community². This demand emerged in the public consultation for this Plan, which identified a need for small houses for people who wish to downsize (see paragraph 6.12).</p> <p>There is an unmet demand for self-built and custom-built in England³. The Self-build and Custom Housebuilding Act 2015 requires local planning authorities to establish local registers of custom builders who wish to acquire suitable land to build their own home. It also requires local authorities to have regard to the demand on their local register when exercising planning and other relevant functions. Self-build houses offer the possibility of a more diverse type of dwelling than estates, in keeping with Objective 3.”</p>
1.71	The policy would also be strengthened if evidence was provided in the reasoned	Accepted.	No further change – see 1.70 above.

¹ Shiro Ota: House of Commons Library Briefing Paper No. 07423. 9 December 2015. Housing an Ageing Population (England).

² Connors et al - footnote 2 p9

³ Wendy Wilson: House of Commons Library Briefing Paper No. 06784. Self-Build and Custom-Build Housing (England)

	justification to explain why 1 or 2 bedroom dwellings, properties for the elderly and plots for self build in particular are being encouraged.	Insert additional supporting text.	
7.0 Open Spaces			
Policy MKD9 Local Green Spaces 1.72	<p>Policy MKD9 identifies and seeks to protect 9 Local Green Spaces. The identified Local Green Spaces are:</p> <ol style="list-style-type: none"> 1. Chantry Academy Conservation Area; 2. Millennium Green; 3. Badger Green; 4. Hollins Lane banks; 5. Martley Playing Field; 6. Crown Orchard; 7. Hopyards Green; 8. Crown Meadow; 9. Ankerdine Common. <p>Appendix 2 of the Plan includes a Table which helpfully sets out the justification for the 9 sites. Map 3 (Proposals Map) shows the location of proposed Local Green Spaces 1 to 8. Appendix 2 also includes a map showing the location of Site 9 (Ankerdine Common). Paragraphs 7.3 – 7.7 of the reasoned justification seek to summarise key features in most of the proposed Local Green Spaces.</p>	Noted.	No change.

	<p>The Framework makes provision for a neighbourhood plan to identify Local Green Spaces of particular importance to the local community. Paragraph 76 states that ‘by designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances’.</p>		
1.73	<p>Local Green Space is a restrictive and significant policy designation. It gives the land a similar status to that of Green Belt and for that reason the Framework states that such designations will not be appropriate for most green areas or open space. It should only be used when the green space is in reasonably close proximity to the community it serves, where it is demonstrably special to the local community and holds a particular local significance. The allocation of each Local Green Space within the policy therefore requires robust justification which Appendix 2 seeks to provide.</p>	Noted.	No change.
1.74	<p>The policy and paragraph 7.1 make reference to open spaces.</p> <p>It should be noted that the Framework distinguishes between Open Space (in paragraphs 73 – 74) and Local Green Space (paragraphs 76 – 78).</p>	Noted.	No change.

	<p>The Framework glossary definition of Open Space is “all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.” Each site identified as a Local Green Space must address the criteria in the Framework, and most particularly demonstrate why it is “demonstrably special” and “holds a particular local significance”.</p>		
1.75	<p>In relation to Ankerdine Common, it should be noted that paragraph 77 of the Framework says that the Local Green Space designation should be reasonably close proximity to the community that it serves. It should also be noted that the law restricts the kind of activities that can be carried out on commons.</p>	<p>Noted.</p> <p>Ankerdine Common is further away from the centre of the village of Martley and other settlements than other local green spaces, but it is nonetheless highly valued and well used by many members of the local community from across the neighbourhood area.</p>	No change.
1.76	<p>It is noted that proposed Local Green Spaces 6, 7 and 8 are either within or adjacent to the new Crown Meadow development. Paragraph 77 of the Framework says that Local Green Space designation should only be used where the green area is demonstrably special and</p>	<p>Noted.</p>	No change.

	holds a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife.		
1.77	The policy prematurely implies that the proposed Local Green Spaces are designated. It may be more appropriate to say that the Local Green Spaces as identified on Map 3 (and Map 13) <u>will</u> be protected from development except in very special circumstances.	Accepted. Amend wording of MKD9 as suggested.	Amend Plan. Amend MKD9 Delete the first sentence and replace with: “The Local Green Spaces as identified on Map 3 (and Map 13) will be protected from development except in very special circumstances.” Note new numbering.
1.78	It is for the Parish Council to decide how best to present the supporting evidence, but it is suggested that the table in Appendix 2 could be included in the reasoned justification to explain why the Local Green Spaces have been proposed for designation.	Accepted. Move the Table in Appendix 2 into the main text after paragraph 7.7.	Amend Plan. Amend para 7.7 – <u>Insert table from Appendix 2 and delete from Appendix.</u>
Policy MKD10 Providing Green Infrastructure 1.79	Policy MKD10 requires all new development to include ecological enhancements as part of landscaping and design. The intention behind MKD10 is laudable. However, the policy seems to relate more to biodiversity rather than the wider aspects of green infrastructure.	Noted. The justification provides a useful explanation of the types of green infrastructure schemes which can support biodiversity.	Amend Plan. Rename Policy MKD10 to “Providing Green Infrastructure to support Local Biodiversity” .

	The justification for requiring new development to include enhancements such as sustainable drainage systems, re-naturalising watercourses, woodland planting, roosting opportunities for bats, the installation of bird nest boxes and the use of native species is unclear.		
1.80	It is also unclear whether Policy MKD 10 could be applied consistently and with confidence when determining planning applications.	Accepted. Amend wording to Policy MKD10.	Amend Plan. Amend MKD10 – delete “are required to” and change to “are encouraged to”.
8.0 Community Life			
Policy MKD11 Providing, Enhancing and Protecting Recreation Open Space 1.81	Policy MKD11 seeks to protect sports facilities at Chantry School and playing fields next to Martley Memorial Hall. MKD11 also requires new development to make a contribution towards the provision of open space in accordance with SWDP 39 (Provision for Green Space and Outdoor Community Uses in New Development). Policy MKD11 signposts applicants and decision makers to SWDP 38 and SWDP 39.	Noted.	No change. Note new numbering.
1.82	In relation to playing field next to Martley Memorial Hall it should be noted that Policy MKD9 (Local Green Space) already seeks to protect the land from development except in very special	Noted.	No change.

	circumstances.		
1.83	<p>The supporting text in paragraphs 8.1 to 8.9 provides an interesting commentary on local community facilities in MKD and community aspirations. However, some of the commentary is not related to land-use planning nor directly relevant for the justification of policies MKD11 and MKD12.</p> <p>Whilst the supporting text provides a clear summary of existing sports and recreation facilities in Martley, there is little to identify the strategic priorities in terms of future play, sport & recreation provision and nothing to identify the needs of Knightwick or Doddenham.</p>	<p>Noted.</p> <p>This text sets out the issues that have been identified through the public consultation process and demonstrates to local residents that the NDP has been prepared taking on board local issues and evidence.</p>	No change.
1.84	<p>Paragraph 8.3 – to ensure that the plan does not become out-of-date, it is suggested that clarification from Freedom Leisure is sought that they will continue to offer “Lottery-funded ‘Sportivate’ programme for young people and activities for children during school holidays” once the Sportivate funding comes to an end in March 2017.</p>	<p>Accepted.</p> <p>Update Plan text.</p>	<p>Amend Plan.</p> <p>Update sentence referring to Sportivate project: “Sport Martley provides a holiday club for children aged 5 – 14 years, with activities including football, basketball, athletics, and arts and crafts.”</p> <p>“Martley Parish Council has secured Section 106 funding for a BMX and skateboard track.”</p>
1.85	<p>Paragraph 8.8 – it should be noted that the burial ground project is about to be fully funded (just awaiting confirmation from S106 Sign Off group). It is therefore</p>	<p>Accepted.</p> <p>Update Plan text.</p>	<p>Update sentence referring to burial ground. “Martley Parish Council has committed Section 106 funds to a new burial ground on the Berrow Green Road and to the proposed BMX Skateboard track. Other priorities identified at a public meeting</p>

	suggested that it would make good sense to identify future aspirations / priorities in relation to Public Open Space S106 funding.		include a hard-surfaced path along the side of the playing field between Martley Memorial Hall and Hastings Close, a footpath around the village suitable for mobility scooters and pushchairs, improvements to the Millennium Green, improvements to the Memorial Hall, and a geological interpretation centre.”
Policy MKD12 Providing and Protecting Local Community Facilities 1.86	<p>Policy MKD12 seeks to:</p> <ol style="list-style-type: none"> 1. Support the provision of new community and leisure facilities, subject to there being an identified local need, and 2. Protect existing community and leisure facilities, unless it can be demonstrated that there is no longer a need for the facilities or the facilities are provided no more than 800 metres from the community it serves. <p>Paragraph 8.10 primarily relates to the network of local roads and footpaths and does not relate providing and protecting local facilities.</p>	<p>Noted.</p> <p>Delete paragraph 8.10 and move to Transport and Travel section after paragraph 10.3.</p>	<p>Amend Plan.</p> <p><u>Delete paragraph 8.10 and move to Transport and Travel section after paragraph 10.3.</u></p>
1.87	The first part of MKD12 says that the provision of new community and leisure facilities or the enhancement of existing facilities will be supported where there is an identified local need.	<p>Noted.</p> <p>Amend Policy MKD12.</p>	<p>Amend plan.</p> <p>Amend Policy MKD12: Delete: “where there is an identified local need.”</p>

	It is unclear how this need will be identified or by whom.		
1.88	<p>Whilst the first part of Policy MKD12 is very positive about supporting community and leisure facilities, it does not provide sufficient clarity about what other conditions would need to be met to make the provision of new community and leisure facilities acceptable.</p> <p>It is recommended that development proposals that provide community and leisure facilities should also be required to demonstrate that:</p> <p>The siting, scale and design respects the character of the surrounding area, including any historic and natural assets;</p> <p>The local road network is capable of accommodating the additional traffic movements; and adequate parking is provided on the site.</p>	<p>Accepted.</p> <p>Amend Policy MKD12 as suggested.</p>	<p>Amend plan.</p> <p>Amend Policy MKD12: Insert additional text after first paragraph: “Development proposals that provide community and leisure facilities will be required to demonstrate that:</p> <p>- The siting, scale and design respects the character of the surrounding area, including any historic and natural assets;</p> <p>- The local road network is capable of accommodating the additional traffic movements; and</p> <p>- adequate parking is provided on the site.”</p> <p>Note new numbering.</p>
1.89	Would the sports facilities at Chantry School and playing fields next to Martley Memorial Hall be amongst the facilities protected in MKD12? If so, would Policy MKD11 be necessary?	<p>Noted.</p> <p>The Parish Council considers that Policy MKD11 should be retained as this refers more to open spaces while MKD12 covers a broader range of local community</p>	No change.

		uses.	
1.90	<p>The second part of the Policy MKD12 relates to the protection of unnamed community and leisure facilities.</p> <p>A list or map showing the location of the community facilities to be protected should be included in the Plan to provide certainty to providers of the facilities and decision makers. Would the Knightwick Memorial Hall, which paragraph 8.3 says is likely to be disposed of, be protected under MKD12?</p>	<p>Accepted.</p> <p>Include a map identifying the location of local community facilities.</p>	<p>Amend Plan.</p> <p>Insert a new map identifying the location of local community facilities.</p>
1.91	<p>If the community wishes to protect specific facilities, have any of them been proposed as Assets of Community Value?</p>	<p>Noted.</p> <p>Further information should be provided in the Actions for the Parish Council.</p>	<p>Insert further text:</p> <p>“Parish Councils’ Action 4 Community Assets</p> <p>It is proposed that the Parish Councils will nominate the following assets (and any others which come forward through the consultation process) to be registered on the Community Asset register with Malvern District Council:⁴</p> <p>The Talbot Hotel</p> <p>The Admiral Rodney Public House</p> <p>The Crown Public House</p> <p>The Parish Hall, Martley (former pupil referral unit)</p> <p>Martley Central Stores and Post Office.”</p>

⁴ <http://www.malvernhills.gov.uk/assets-of-community-value>

<p>1.92</p>	<p>Policy MKD12 currently says that before any change of use would be supported it would have to be empty for at least 2 years.</p> <p>This could encourage vacant premises. MKD12 also proposes very prescriptive marketing, some of which may not be relevant. MKD12 also requires replacement facilities to be no more than 800 metres from the community it serves. What if replacement facilities were 850m away, but still nearer than the existing facility?</p>	<p>Noted.</p> <p>New text should be inserted reducing the vacancy period to 12 months.</p>	<p>Amend text to: “Changes of use to Martley Playing Field and Sport Martley will be resisted unless it can be demonstrated that the existing use is no longer economically viable or equivalent or better provision of the facility to be lost is made in an equally or more accessible location. If the existing use is no longer economically viable, evidence should be provided to show that the site has been actively marketed, at the market rate current at the time, for at least 12 months and that no sale or let has been achieved during that period.”</p>
<p>1.93</p>	<p>To address the above concerns, it is suggested that the second part of Policy MKD12 could be re-worded along the following lines:</p> <p>Changes of use to [named facilities] will be resisted unless it can be demonstrated that the existing use is no longer economically viable or equivalent or better provision of the facility to be lost is made in an equally or more accessible location.</p> <p>If the existing use is no longer economically viable, evidence should be provided to show that the site has been actively marketed, at the market rate current at the time, for at least 12 months</p>	<p>Accepted.</p> <p>Amend MKD12 as suggested.</p>	<p>No further change – see 1.92 above.</p>

	and that no sale or let has been achieved during that period.		
1.94	It is suggested that the supporting text could include reference to SWDP 37 (Built Community Facilities) which also supports the provision of new community facilities, particularly where proposals have resulted from neighbourhood planning. SWDP 37 also seeks to protect community facilities.	Accepted. Amend supporting text as suggested.	Amend Plan. Insert additional supporting text after para 8.10: “SWDP 37 Built Community Facilities supports the provision of new community facilities, particularly where proposals have resulted from neighbourhood planning. SWDP 37 also seeks to protect community facilities.”
Non Land Use Policy – Action for the Parish Council – Community Assets (Assets of Community Value)			
Parish Councils’ Action 3 - Community Assets 1.95	<p>Planning Practice Guidance says that wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but actions dealing with non land use matters should be clearly identifiable. For example, set out in a companion document or annex.</p> <p>The aspiration of the Parish Councils to nominate potential Assets of Community Value (ACV) is included in the body of the Neighbourhood Plan but is clearly labelled as an Action for the Parish Councils and shaded in a different colour to distinguish it from the land-use policies.</p>	<p>Noted.</p> <p>Include additional supporting text as suggested summarising the purpose of nominating potential assets and why it is considered that the proposed assets would meet the definition of an ACV as set out in Section 88 of the Localism Act 2011. It should be noted that here is no guarantee that ACV nominations will be successful.</p>	No further change – see 1.91 above.

	<p>The MKD Parish Councils propose to nominate 6 buildings for consideration as ACV's to Malvern Hills District Council, together with any that may come forward through the neighbourhood plan consultation process.</p> <p>It should be noted that the driving principle of the ACV legislation is to provide a Community Right to Bid should such assets come onto the open market thereby offering communities an opportunity to seek to acquire and operate a local asset for the benefit of the local and wider community.</p> <p>It would be helpful if the supporting text summarised the purpose of nominating potential assets and why it is considered that the proposed assets would meet the definition of an ACV as set out in Section 88 of the Localism Act 2011. It should be stressed that there is no guarantee that ACV nominations will be successful.</p>		
9.0 The Local Economy			
Policy MKD13 Supporting Local Employment 1.96	Policy MKD13 supports the following development of land for employment uses: <ol style="list-style-type: none"> 1. Business (B1), general industrial (B2) and warehousing (B8) at the 	Noted.	No change.

	<p>Maylite and Edgar trading estates,</p> <ol style="list-style-type: none"> 2. Extensions to existing B1, B2 and B8 premises (providing it does not conflict with other policies in the Neighbourhood Plan and SWDP), 3. Rural diversification at existing agricultural businesses (subject to conditions relating to size, scale and not prejudicing existing agricultural operations), and 4. Extensions to existing dwellings to support home-based working. 		
1.97	Policy MKD13 also seeks information technologies to be included in all new employment development.	Noted.	No change.
	Paragraphs 9.1 – 9.4 provide background information for MKD13, but many of the issues raised in these paragraphs are not addressed by the policy. For example:		
1.98	Paragraph 9.1 says that the neighbourhood plan should include provision for the expansion of Chantry School. It also says that Martley Primary school may expand and sites must be designated to enable this. Neither MKD13 or other neighbourhood plan policies make provision for the expansion of the schools.	<p>Accepted.</p> <p>The text relating to the schools would be better placed in the section on local community facilities.</p>	<p>Amend Plan.</p> <p>Paragraph 9.1 - delete text beginning “However, by far...” to end of paragraph.</p> <p>Move text to new paragraph after 8.10.</p>
1.99	Paragraph 9.2 says that there is sufficient vacant space for new industrial and	Accepted.	Amend Plan.

	<p>commercial development on local trading estates for the foreseeable future. It also says that expansion of existing trading estates would have a negative impact on the rural characteristics of the area.</p> <p>Yet, MKD13(1) indicates that development at the Maylite and Edgar Trading Estates would be supported.</p>	Amend text in paragraph 9.2.	Amend Para 9.3 second sentence to read: “However, the creation of large new trading estates or the expansion of existing ones <u>could</u> have a negative impact on the rural characteristics of the neighbourhood area.”
1.100	Paragraph 9.2 indicates support for the conversion of redundant buildings for employment uses but this is not addressed in MKD13.	Accepted. Amend MKD13 to include conversion of redundant buildings for employment uses.	No further change. See 1.105 below.
1.101	<p>MKD13(1) – It should be noted that the Maylite and Edgar trading estates probably have established use rights or planning permissions.</p> <p>Confirmation of whether MKD13(1) is supporting existing uses or proposing new uses would be helpful.</p> <p>In light of the comment about the negative impact that the expansion of existing trading estates would have on the rural character of the area, presumably MKD13(1) supports the intensification of the trading estates, but not expansion?</p> <p>Clarification on this matter would be helpful.</p>	Accepted. Amend MKD13 as suggested to provide clarification.	Amend Plan. Note new numbering. Amend text to MKD13(1) to: “1. Intensification of existing business (B1), general industrial (B2) and warehousing development (B8) and uses at the Maylite Trading Estate, and Edgar Estate;”

1.102	<p>MKD13(2) is broadly consistent with SWDP 12 (Employment in Rural Areas). SWDP 12C says that the expansion of existing employment sites in rural areas will be supported where it has been demonstrated that intensification of the existing site is not viable or practical.</p> <p>It is noted, however, that MKD13(2) relates only to B1, B2 and B8 use classes.</p> <p>MKD13(2) does not relate to broader employment in tourism, leisure / recreation which might be important to the MKD area given the importance attached to tourism in other parts of the plan. Is there a reason why MKD13(2) is more restrictive than SWDP 12 by relating to B1, B2 and B8 uses only?</p>	<p>Noted.</p> <p>The Policy could be extended to include tourism related uses and development.</p>	<p>Amend Plan.</p> <p>Amend MKD13(2) to read:</p> <p>“2. Extensions to existing rural B1, B2 and B8 premises and new tourism and leisure related development where they do not conflict with other policies in this plan and the SWDP;”</p>
1.103	MKD13(3) is consistent with SWDP 12D.	Noted.	No change.
1.104	<p>MKD13(4) supports extensions to existing dwellings to support home-based working providing that it does not lead to an adverse impact on the amenity of adjacent users and uses.</p> <p>It should be noted that some home-based businesses do not need planning</p>	<p>Accepted.</p> <p>Amend wording of MKD13(4) to improve clarity.</p>	<p>Amend Plan.</p> <p>Amend MKD13(4) to:</p> <p>“4. Extensions to existing dwellings to support home-based working where this would not lead to an adverse impact on the amenity of adjacent users and uses, and subject to other policies in the Martley, Knightwick and Doddenham NDP and SWDP.”</p>

	<p>permission, and extensions would be considered on their general design merits rather than in relation to a business use. It is considered that MKD13(4) could be quite permissive and could lead to extension applications under the justification of being for “home based working” space.</p>		
1.105	<p>The supporting text in paragraph 9.2 indicates opportunities for the conversion of redundant buildings, but no policies address this in the neighbourhood plan. If this is an important issue for the MKD area, a policy along the following lines may be appropriate:</p> <p>The reuse of redundant or disused buildings for business, leisure or residential purposes will be supported provided that the proposed use meets all the following criteria:</p> <ul style="list-style-type: none"> i) the development would lead to an enhancement to the immediate setting, ii) design proposals respect the character and significance of the redundant or disused building, iii) the proposal is compatible with neighbouring uses, including any continued agricultural operations and would not cause undue 	<p>Accepted.</p> <p>Insert additional Policy as suggested.</p>	<p>Amend Plan.</p> <p>Insert additional Policy:</p> <p>“Policy MKD X Re-use of Redundant or Disused Buildings for Economic Uses</p> <p>The reuse of redundant or disused buildings for business, leisure or residential purposes will be supported provided that the proposed use meets all the following criteria:</p> <ul style="list-style-type: none"> i) the development would lead to an enhancement to the immediate setting, ii) design proposals respect the character and significance of the redundant or disused building, iii) the proposal is compatible with neighbouring uses, including any continued agricultural operations and would not cause undue environmental impacts, i) the buildings are of permanent and substantial construction capable of conversion without major or complete reconstruction; and v) the building is capable of accommodating the proposed new use without the need for substantial alteration or extension, ancillary buildings, areas of hard standing or development which individually

	<p>environmental impacts,</p> <p>iv) the buildings are of permanent and substantial construction capable of conversion without major or complete reconstruction; and</p> <p>v) the building is capable of accommodating the proposed new use without the need for substantial alteration or extension, ancillary buildings, areas of hard standing or development which individually or taken together would adversely affect the character or appearance of the building or have a detrimental impact on its surroundings and landscape setting.</p>		<p>or taken together would adversely affect the character or appearance of the building or have a detrimental impact on its surroundings and landscape setting.”</p> <p>Note new numbering.</p>
1.106	<p>MKD13 also seeks to ensure that the latest information technologies are included in all new employment development. It is noted that there is not a similar requirement in the neighbourhood plan for housing development. If this is an important issue for the MKD area, a general policy (perhaps in the design principles) along the following lines may be appropriate:</p> <p>Improvements to broadband infrastructure will be supported. Any new</p>	<p>Accepted.</p> <p>Delete last sentence in policy MKD13 and replace with new policy as suggested.</p>	<p>Amend Plan.</p> <p>Amend MKD13 Delete final sentence.</p> <p>Insert new policy MKD X Supporting New Communication Technologies</p> <p>“Improvements to broadband infrastructure will be supported. Any new development within the parish should be served by a superfast broadband (fibre optic) connection unless it can be demonstrated through consultation with the NGA Network providers that this</p>

	<p>development within the parish should be served by a superfast broadband (fibre optic) connection unless it can be demonstrated through consultation with the NGA Network providers that this would not be possible, practical or economically viable. In such circumstances, suitable ducting should be provided within the site and to the property to facilitate future installation.</p>		<p>would not be possible, practical or economically viable. In such circumstances, suitable ducting should be provided within the site and to the property to facilitate future installation.”</p> <p>Note new numbering.</p>
<p>Non Land Use Policy – Action for the Parish Council – Promoting Rural Walking</p>			
<p>Parish Councils’ Action 4 - Promoting Rural Walking</p> <p>1.107</p>	<p>Planning Practice Guidance says that wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but actions dealing with non land use matters should be clearly identifiable. For example, set out in a companion document or annex.</p> <p>The aspiration of the MKD Parish Councils to work with local employers and the Local Enterprise Partnership to promote the neighbourhood area as a destination for rural walking is included in the body of the Neighbourhood Plan but is clearly labelled as an Action for the Parish Councils and shaded in a different colour to distinguish</p>	<p>Not accepted.</p> <p>The Steering Group / Parish Council consider that attracting people to walk in the area makes a significant contribution to the rural economy and it is appropriate to include reference to this therefore in the Economy chapter.</p> <p>Please note that further information is also provided in Chapter 10, Transport.</p>	<p>No change.</p>

	<p>it from the land-use policies.</p> <p>Chapter 9 of the Neighbourhood Plan relates to maintaining employment opportunities in the MKD area. In this context, it is unclear why the promotion of rural walking is included in Chapter 9. Is the purpose of the action to encourage walking for travel-to-work purposes? If the purpose is to encourage healthy living or tourism it may be more appropriate to include the action in the Chapter on Community Life or a general tourism policy.</p>		
10.0 Transport and Travel			
<p>Policy MKD14 Transport Management</p> <p>1.108</p>	<p>Policy MKD14 seeks to:</p> <ol style="list-style-type: none"> 1. Review development proposals to ensure that they are sustainable in terms of infrastructure and road safety, 2. Encourage slower vehicle speeds in the MKD parishes, 3. Ensure that the design of new street furniture and signage is appropriate to the area, and 4. Ensure that any new car parking in the MKD area is small in scale. 	Noted.	No change.

<p>1.109</p>	<p>It is noted that the supporting text in paragraphs 10.1 to 10.5 highlight a number of specific transport related concerns in the MKD area.</p> <p>However, none of the concerns appear to relate to the issues which Policy MKD14 is seeking to address – speeding vehicles, street furniture and car parking. As such, it is considered that there is currently a lack of robust, proportionate, evidence to support the MKD14.</p>	<p>Accepted.</p> <p>Amend Policy MKD14 to address the specific concerns in the supporting text.</p>	<p>Amend Plan.</p> <p>Note new numbering.</p> <p>Amend MKD14.</p> <p>“Developer contributions and other funding will be sought to improve accessibility, transport and traffic management measures in the neighbourhood area. The following measures will be supported:</p> <ul style="list-style-type: none"> • Investment in public transport provision. • Provision of pavement, cycle and walking routes and safe crossing places for pedestrians on major roads. • Introduction of measures designed to slow vehicular speed and • Car parking. <p>New development should be designed in such a way to encourage slower speeds in keeping with the local area, in accordance with standards recommended by Worcestershire County Council. Car parking should be accordance with the standards adopted at the time”</p>
<p>1.110</p>	<p>MKD14(1) – it should be noted that the neighbourhood plan does not have the right to review extant planning permissions.</p>	<p>Noted.</p> <p>This part of the Policy may be more appropriate as an identified action for the Parish Council.</p>	<p>Amend Plan.</p> <p>Amend Actions for the Parish Councils:</p> <p>“Review the impact of development proposals on the existing environment to ensure it is sustainable in terms of infrastructure, road safety and the standards required to maintain peaceful and safe rural parishes.</p> <p>Promote street furniture and signage which is practical, of modest</p>

			with local surroundings. Street furniture and signage within the conservation area should follow the principles outlined in the Conservation Area Character Appraisals.”
1.111	MKD14(2) - It is understood that traffic calming is not something that the County Council encourages within new developments as they should be designed in a way to encourage slower speeds without the need for physical measures. However, it is noted that the policy supports standards recommended by Worcestershire County Council.	Noted.	No further change. See 1.109 above.
1.112	MKD14(3) - It is appreciated that the local community want to ensure that street furniture and signage is appropriately designed. However, the link between signage and development proposals is tenuous. It is considered that this issue would be more appropriately included in Action 5 which facilitates a dialogue between the County Council and Parish Councils on transport issues.	Accepted. Delete Policy MKD14 (3) and move to an Action for the Parish Councils.	No further change. See 1.110 above.
1.113	MKD4(4) – It is suggested that any policy related to car parking should make reference to the County Council’s Parking Standards in Appendix A of the Worcestershire County Council’s Highways	Accepted. Amend MKD14 as suggested.	No further change. See 1.109 above.

	<p>Design Guide at http://www.worcestershire.gov.uk/downloads/file/1847/highways_design_guide</p> <p>It is suggested that a car parking policy along the following lines may be appropriate:</p> <p>Car parking should be in accordance with the standards adopted at the time.</p>		
Non Land Use Policies – Actions for the Parish Council			
<p>Parish Councils’ Action 5 Road safety</p> <p>1.114</p>	<p>Planning Practice Guidance says that wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but actions dealing with non land use matters should be clearly identifiable. For example, set out in a companion document or annex.</p> <p>The aspiration of the MKD Parish Councils to work with Worcestershire County Council to explore opportunities to address existing road safety concerns is included in the body of the Neighbourhood Plan but is clearly labelled as an Action for the Parish Councils and shaded in a different colour to distinguish it from the land-use policies.</p> <p>The issues outlined in Action 5 seek to</p>	<p>Noted.</p>	<p>No change.</p>

	address existing transport-related issues outlined in paragraphs 10.2 to 10.4.		
12.0 Monitoring and Review 1.115	<p>To reflect Planning Practice Guidance, it is suggested that paragraph 6.2 be amended as follows:</p> <p>The Martley, Knightwick and Doddenham Parish Councils will regularly monitor the implementation of the neighbourhood plan.</p> <p>When new issues are identified, policies are found to be out of date or in need of change, for example due to changing national or strategic planning policy, the Parish Councils in consultation will work with Malvern Hills District Council, may decide to formally review and update the plan or part of it.</p>	<p>Accepted.</p> <p>Amend text as suggested.</p>	<p>Amend Plan.</p> <p>Amend Paragraph 6.2 to:</p> <p>“Martley and Knightwick and Doddenham Parish Councils will regularly monitor the implementation of the Neighbourhood Plan. When new issues are identified, policies are found to be out of date or in need of change (for example due to changing national or strategic planning policy), the Parish Councils in consultation with Malvern Hills District Council may decide to update the all or part of the plan.”</p>
APPENDICES			
Appendix 1. Significant Views	Please see comments relating to Policy MKD1(1)	Noted.	No further change.
Appendix 2. Local Green Spaces			
Appendix 3. Bibliography			
Glossary	It is suggested that a Glossary of terms may be helpful.	Accepted.	Insert a Glossary of Terms as an Appendix.