



worcestershire county council

David Clarke

Planning Policy

Malvern Hills District Council

The Council House

Avenue Road

Malvern WR14 3AF

23th June 2017

Dear Mr Clarke

**RE: Martley, Knightwick & Doddenham Neighbourhood Plan -
Regulation 16 Consultation**

Worcestershire County Council welcomes the opportunity to comment on the above consultation. The following officer-only response is from our Education, Sustainability and Minerals & Waste teams. Other Worcestershire County Council teams may choose to make their own response.

If you would like to discuss any of these comments please do not hesitate to contact Marta Dziudzi (email: [REDACTED], telephone [REDACTED]) in the first instance.

Yours Sincerely,

Emily Barker

Strategic Planning and Environmental Policy Manager

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Education

The County Council's Children, Families and Communities Department notes the reference in the Neighbourhood Plan (the Plan) to the Chantry School and Martley CE Primary School serving the area. We would like to enquire whether reference to Broadwas CE Primary should also be included in the Neighbourhood Plan. The school, although not situated in the Neighbourhood Planning area, serves the families resident in the parishes of Doddenham and Knightwick.

Where planned housing development has been identified, we will continue to monitor housing growth in and around the local area and respond appropriately to ensure a sufficiency of school places, in line with current published policies. We will continue to work with schools serving the local area to protect and enhance school assets.

Sustainability

Water and food waste recycling

We welcome that the use of recycled, salvaged or reclaimed materials is encouraged in the Plan.

The Plan could also specify that all new houses should be provided with a compost bin and water butt. Collecting rainwater for use in the grounds of buildings will reduce the demand on drinking water. Providing composting bins will support the diversion of food waste away from the residual waste bins and provide a resource to be used to maintain gardens.

Ultra low emissions vehicles

We suggest that the Plan enhances provision for sustainable transport by encouraging the use of electric cars. Electric vehicles help to improve air quality and reduce carbon emissions. The Plan could include a requirement for new developments to install electric vehicle chargepoints for public use or to ensure infrastructure is in place to enable installation of chargepoints in the future. Additionally, the Plan could encourage existing commercial or retail

areas to consider installing electric vehicle chargepoints. 7kW electric vehicle chargepoints, which charge a car in 2-3 hours, are relatively inexpensive and help to facilitate and encourage local electric vehicle ownership.

Energy

We are encouraged by the reference to alternative forms of energy in the Plan. We also welcome Policy MKD3 which supports "*the use of natural materials from environmentally-responsible sources, the use of energy saving materials, and materials of high quality, which have been reclaimed, salvaged or recycled*" in new developments.

However, the Plan could go further to include a minimum requirement for energy generation from renewable sources. We would advise that such policy is developed in detailed discussions with the Local Planning Authority to ensure its alignment with SWDP 27. Consideration could also be given to the concept of retrofitting renewable energy solutions to existing developments and structures, such as installation of solar panels on community buildings.

The Plan could encourage opportunities for communities to be involved either through developing their own schemes or by investing in the schemes of others. Community energy generation includes a range of options for both renewable electricity or/and renewable heat generation. These options vary from solar panels on a community building to a district heat network (a shared heating system for a new development).

Community energy schemes have multiple benefits. They can contribute to the reduction of the community's carbon emissions, and can also improve energy security, meaning that a community will not be fully dependent on outside energy sources. They can also potentially generate vital revenue for a community which then can be utilised for other community projects and initiatives.

The Department for Energy and Climate Change's (now the Department for Business, Energy and Industrial Strategy) Community Energy Strategy could

be used to inform this section

(<https://www.gov.uk/government/publications/community-energy-strategy>).

Minerals and Waste

Section 2.3 "Other relevant local strategies" of the Plan should include reference to the adopted Waste Core Strategy, the adopted County of Hereford and Worcester Minerals Local Plan, and the emerging Worcestershire Minerals Local Plan. We would recommend including the following paragraphs:

- Waste Core Strategy Local Plan (2012). This forms part of the statutory Development Plan. As well as planning for waste management facilities in the county, it sets out policies requiring the waste implications from all types of development to be considered. In particular:
 - Policy WCS 5 (Landfill and Disposal) and its supporting text states that excavation activities, a normal part of the construction process, can result in considerable arisings of subsoils. In some cases, this type of waste can usefully be re-used for purposes such as landscaping, levelling of sites, the construction of bunds, embankments or features for noise attenuation. However, to prevent inappropriate development, these kinds of proposals will be considered against Policy WCS 5: Landfill and disposal.
 - Policy WCS 17 on making provision for waste in all new development expects that the level of on-site provision for waste for all new developments should be adequate to meet the needs of that development.
 - The adopted County of Hereford and Worcester Minerals Local Plan 1997: This forms part of the statutory Development Plan. It sets out the Council's planning policies for the extraction and restoration of minerals sites within the county with a focus on the extraction of aggregates. A new Minerals Local Plan for Worcestershire is being developed.
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Local landscape features are listed in paragraph 4.15 of the Plan. A number of these include "quarries". None of these quarries are currently active or have extant planning permissions. We therefore consider that, for the avoidance of doubt, it would be prudent to amend the wording to refer to former quarries in the text about The Nubbins and The Knightwick Limestone Quarries. This also applies to the text in "Parish Council's Action 1 Martley Conservation Area".
