

REGULATION 15 SUBMISSION

CONSULTATION STATEMENT: ISSUES AND CONCERNS RAISED AND HOW THEY WERE ADDRESSED

ORGANISATION	CONCERN RAISED	ADDRESSED BY
RCA Regeneration	Para 7 Policy MnGr 6 was updated this should trigger a substantial review*	Policy MnGr 6 original policy reinstated. Updated information to be included as a footnote
	Para 9 (MnGr6 para 6) text should refer to 20 properties not applications	Corrected
	Para 12 (MnGr 7 para 6) Site A is built out.	Now described as being built out
	Para 13 Full details of site B should be included	Para's 8-11 following MnGr7 reinstated
	14 MnGr 7 Sites C & D need to be confirmed as being available	Confirmed as being available.
	15 Synchronise times of the SWDP with the Neighbourhood plan. Conduct a substantial review.	It is desirable that the plans are synchronised. The NPPF recommends that a Neighbourhood Plan be updated every 5 years. Delays to the SWDP are preventing this objective. Once the SWDP is made consideration will be given to a further review.

*Para number refers to the paragraphs in RCA's document

ORGANISATION	CONCERN RAISED	ADDRESSED BY
MHDC	Define South Worcestershire Councils	Changed to include Malvern Hills District Council, Wychavon District Council and Worcester City Council
	Add Neighbourhood before the word plan on the caption 3.5, Introduction and Section 3.1 Plan approval process	Corrected
	Policy MnGr1 Housing Mix Threshold not given to implement a mix of houses.	This is covered by SWDP 14 this is included under National and Local policies and gives a threshold of 5 houses. Strengthened by including Para's 63 and 64 NPPF section 5 SWDP 15 Paras 14A and 14 are added to National and local Policies
	Definition of starter homes required.	The housing and planning Act 2016 defines starter homes as new homes costing up to £250,000 (£450,000 in London), to be available at a minimum 20% discount on market value to eligible first-time buyers. This is included in Annex 2 Glossary b of the NPPF. Action: include definition of starter home in Section 10 (Glossary)
	Affordable Housing as defined by the NPPF	This is implicit.
Comments from MHDC Housing Officer	MnGr3 Concern over "or a financial contribution of broadly equivalent value" under point 7	Wording from NPPF Section 5 Paras 63 and 64 used.
	MNGR2 Affordable Housing: refers to Lifetime Homes (this is now obsolete)	Change to optional Building Regulations Standard M4(2) Entitles "accessible and adaptable" dwellings in relation to access. Also refer to the Nationally Described Space standards in terms of size. Action: Footnote added, Para 8 changed accordingly.

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ORGANISATION	CONCERN RAISED	ADDRESSED BY
<i>(continuing)</i> Comments from MHDC Housing Officer	Tenancy Mix referencing the number of homes that this applies to	This has been tested and successfully used under application M/22/00471/FUL and is considered to be functional
	MnGr3 Allocation of affordable Housing: MHDC Rural Lettings policy June 2005 has been updated	Changed to 26 January 2021
	The use of the word 'strong' is considered inappropriate	Footnote to policy added referring to MHDC letting policy
	'First to be offered' is considered inappropriate	Footnote to policy added referring to MHDC letting policy
	'shared ownership of the home' is considered Inappropriate	Footnote to policy added referring to MHDC letting policy
	Point 4 Benefits and outcomes 'will'	['will'] to be replaced by 'may'
	Point 7 'Homes Choice Plus' is obsolete	Replaced with 'Housing for You'
	MnGr4Infill/Backland Housing in the Parish: Clarify infill – backland	Footnote added defining Backland referencing Uttlesford District Council Essex
	Evidence required to support three-bedroom limit in Infill/Backland sites	As per Q18 of the residential survey. Types of property needed 2/3 bedroom 163 in favour 22 against. Backland added to para 9.
	Not all gaps may be appropriate for infill considered to be impractical to test applications	Definition of Backland updated – as 'having no road frontages'.
	MnGr5 Scale of new Development (Limits developments to 10 houses unless there is a master plan phasing development over a number of years). If a housing needs survey identified a need for more than 10 houses this policy could be contradictory.	This policy does not limit the number of houses in the Parish, allowing for many developments and larger developments if phased over time. The villages have grown incrementally over the centuries leading to a wide variation of housing styles thus characterising the villages. This has been confirmed by the original examination.
	Policy MnGR 6 Incremental Growth: Introduction of growth rates is unacceptable	Original policy restored. Footnote added to show achievement against plan.
	MnGr 8 Siting of local businesses: change 'should' to 'would'	Footnote added Referencing NPPF Para 85 and to say that the list is not exhaustive
MnGr 11 Assets of Community Value: Check against Assets of Community Value (England) Regulations 2012	Believed to comply but this requires expert consideration	
BHN1 Protection of Buildings or Structures on the local list of heritage assets: Worcestershire Archive and Archaeology Service no longer provides planning advice to MHDC	Change to 'the planning advisor will review applications and suggest appropriate mitigation'	

Miscellaneous Issues and Concerns		
ORGANISATION	CONCERN RAISED	ADDRESSED BY
The Review Committee	Highways land with habitat verges identified as an asset of community value	Change 'habitat verges' to 'items of value to the community'.
	The NPPF has been updated: need to ensure that where mentioned the policies cross-tabulate	MnGr10 NPPF para 83 and 84 replace old Para 55
	Policy RE 1	Updated to NPPF Paras 132, 135b and 135d
	Policy RE3	Updated to NPPF para 180,185,186
	Policy BHN 4	Updated to NPPF 105 and 106
	Policy Des 1 General Building Design Principles	Updated to NPPF (Section 12, para 1 et seq)

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The Review Committee (<i>continuing</i>)	Policy Des 1 National and Local policies	Updated to NPPF 12 Para 135
	Policy Des 2 Renewable and Low Carbon Energy	National and Local Policies updated to NPPF section 14 Para 158
	Section 10 Glossary	Backland definition added (see above) Lifetimes home added Presumption in favour of sustainable development: updated to NPPF Starter Homes: definition aligned with The Housing and Planning Act 2016 (see above)
	Acknowledgements	Updated
	Appendix D	Changed from 'Assets of Community Value' to 'Assets valued by the community'. References to Highways removed.
	Appendix E	Introduction did not include the Review Process: this is now included in the Introduction
	Quakers Farm missing from Appendix A Listed Structures	Now included
	Appendix A Listed structures	Now included