Representation Form
Consultation on Proposed Modifications to SWDP: 6
October – 14 November 2014

Please use a separate sheet for each modification response
There is an extension form available on the SWDP website that can be downloaded / completed and appended to this form as many times as required. This will enable the Inspector to consider your comments on each modification as promptly as possible.

Consultation runs from Monday October to Friday November 2014.
All comments must be received by 5.00pm on the November.
South Worcestershire Development Plan
Proposed Modifications: 6 October – 14 November 2014

The South Worcestershire Councils (SWC) are seeking representations on the Proposed Modifications to the SWDP, following stage 1 of the Examination (March 2014). The changes are proposed by the SWC to address issues around the need for an uplift of housing numbers to meet the objectively assessed housing need for the area and we are only able to accept representations on these matters.

REPRESENTATIONS MUST ONLY RELATE TO THE CURRENT PROPOSED MODIFICATIONS.

Further representations to the submitted SWDP will not be accepted. There is no need to repeat representations that you submitted at the Pre-Submission consultation stage (January/February 2013).

You can access the SWDP documents online and obtain additional copies of this form from the SWDP website: //www.swdevelopmentplan.org/?page_id=5393

Completed forms should be returned either by

Email to:
@swdevelopmentplan.

Post to:
Paul Bayliss, SWDP Project Manager
c/o Wychavon District Council
Policy Plans Team
Civic Centre
Queen Elizabeth Drive
Pershore
Worcestershire
WR10 1PT

Please note: Unfortunately we are now unable to receive responses sent to the Freepost address previously used. Please ensure that only the address given in this current guidance and associated response forms are used.

ALL REPRESENTATIONS MUST BE RECEIVED IN WRITING NO LATER THAN 5.00PM ON NOVEMBER 2014.

(The following form can be edited electronically by clicking into the boxes and typing -- boxes should automatically expand as needed. Cursor marks will not affect the text or readability of the document)
Before completing the response form we would be grateful if you could tell us more about yourself:

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<tr>
<th>1. Personal Details</th>
<th>2. Agent Details (if applicable)</th>
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<tbody>
<tr>
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<td>First Name</td>
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<td>Last Name</td>
<td>John</td>
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<td>Job Title (if relevant)</td>
<td>Lewis</td>
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<td>Organisation</td>
<td>Williams</td>
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<td>(if relevant)</td>
<td>PlanIT Planning and Development</td>
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<td>Address</td>
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How we will use your details

The personal information you provide on this form will be processed in accordance with the requirements of the Data Protection Act 1998. It will be used only for the preparation of local development documents or any subsequent statutory replacement. However, your name and representations will be made publicly available when displaying and reporting the outcome of the consultation stage, and cannot be treated as confidential.

Other details, including your address and signature, will be treated as confidential.

In agreeing to the holding of your information you are giving permission for your details, held on the database, to be shared between the three local authorities. If you have any concerns or queries relating to this process, please contact 01905 722233.

I agree that contact details and any related responses can be held by the planning service departments of the three South Worcestershire local authorities. I understand that they will only be used in relation to the plan making process as required by the Planning and Compulsory Purchase Act 2004 and other planning-related legislation.

Signed: ___________________________  Date: ___________________________
3. Are you attaching any additional sheets that relate to this representation?

<table>
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<tr>
<th>Yes</th>
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<th>Number of sheets</th>
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4. Which Proposed Modification does your representation relate to?

<table>
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<tr>
<th>Modification Number</th>
<th>PM1</th>
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5. Do you consider the Proposed Modification to be legally compliant?

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<th>Yes</th>
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6. If you consider the Proposed Modification to be unsound, please identify which test of soundness your comments relate to? (tick all that apply)

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As also set out in the accompanying guidance note (paragraph C, page 2 of GUIDANCE NOTE – How to Respond to the Proposed Modifications), these are the tests of soundness to which your comment(s) should relate:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
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- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.
Part A

Please use a separate sheet for each modification response – there is an additional document available on the SWDP website that can be completed and appended to this form as many times as required. This will enable the Inspector to consider your comments on each modification as promptly as possible.

Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the Proposed Modification please also use the box below to set out your comments.

Please note - your representation should provide evidence and information to support / justify your representation and any suggested change.

Your representation should relate only to the current Proposed Modifications.

Modification PM1 seeks to introduce additional text into the SWDP to advise that, as a result of the Inspector’s interim conclusions, the housing requirement in the plan has been established to be 28,400 dwellings. This is text is superfluous.

The modification then goes on to advise that there is no evidence of additional unmet housing need from outside South Worcestershire that must be accommodated in the plan area to add to the South Worcestershire housing requirement. Whilst that may the case at the moment this position could change.

Work is ongoing with the Greater Birmingham and Solihull LEP authorities to establish a housing requirement and distribution for the LEP area. One of the greatest challenges facing the LEP area is Birmingham’s overall housing requirement. The work completed to dates suggests that Birmingham’s housing requirement is 115,900 dwellings. Birmingham City Council is of the view that c51,000 dwellings can be accommodated within the City’s administrative area. There is, therefore, a substantial shortfall of 64,900 dwellings that will need to be met in neighbouring authority’s areas.

The Birmingham Development Plan Duty to Co-operate Statement (September 2014) summarises the progress of the SWDP examination to date and Birmingham City Council’s views on the document. It advises that:

“The City Council did not initially identify South Worcestershire as a location which would be appropriate for significant housing provision to meet Birmingham’s requirements. At the initial opening hearings of the public examination, the City Council supported the level of housing provision proposed although the City Council had, however, raised issues over the apparent
imbalance between the levels of housing and employment land proposed for South Worcestershire and more specifically the detailed wording in relation the proposed Worcester Technology Park.

The Inspector did not share the City Council’s views and has requested following reopened hearing sessions that the level of housing provision should be raised significantly to reflect the jobs-led approach in the plan. As a consequence the level of housing provision appears to be set at a level significantly above demographic need relying on in-migration or in commuting to fill the increasing employment levels. At the reopened hearing the City Council responded by suggesting that the consequence was that at least some of the increasing level of housing provision might help contribute to meeting the emerging housing shortfall in the conurbation, possibly through the rippling effects of migration. This is an opportunity that can be further investigated as part of the ongoing work on the GBSLEP Strategic Housing Needs Study.”

This clearly suggests that South Worcestershire is a location that Birmingham City Council considers a potential location that could help deliver housing to meet its emerging housing requirement. Until the LEP Growth Study is complete it is not certain how much additional housing will be required in the LEP area and how it is best distributed. However, the LEP Growth Strategy could have implications for South Worcester. It is, therefore, our view that it is inappropriate for the plan to be progressed on its premise that there is no evidence of additional unmet housing need from outside South Worcestershire. Clearly that situation could change.
Part B

Please set out what change(s) you consider necessary to make the Proposed Modification legally compliant or sound, having regard to the test(s) you have identified above. You will need to say why this change will make the Proposed Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Your representation should relate only to the current Proposed Modifications.

In order for the plan to be ‘positively prepared’ the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. It is possible that the South Worcestershire Authorities will need to help some of the unmet housing requirements from neighbour authorities. As such proposed Main Modification PM1 should be removed from the plan.
7. If your representation is seeking a change to the Proposed Modification, are you content for it to be considered by written representations, or do you consider it necessary to participate in person at an examination hearing?

| Written representations | X | Participate at an examination hearing |

8a. If you wish to participate at an examination hearing, please outline why you consider this to be necessary:

8b. Where there are a large number of identical or very similar responses to a particular modification, it would assist the Inspector if individuals could work together on presenting a joint case at the hearing. If you are able to do this, please indicate below who will be representing you. Your individual comments will still be considered by the Inspector.

Thank you for taking the time to complete this representation.
South Worcestershire Development Plan Examination

Representation Form – Additional Pages
Consultation on Proposed Modifications to SWDP: 6 October – 14 November 2014

South Worcestershire Councils

Additional sheet(s) for responses to individual modifications – to be appended to main form as required

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South Worcestershire Development Plan  
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4. Which Proposed Modification does your representation relate to?  

| Modification No. | PM9 |

5. Do you consider the Proposed Modification to be legally compliant?  

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Part A

Please use a separate sheet for each reference number.

Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the Proposed Modification please also use the box below to set out your comments.

Please note - your representation should provide evidence and information to support / justify your representation and any suggested change.

Your representation should relate only to the current Proposed Modifications.

The proposed modification at Table 4b are supported insofar as the housing requirement is increased to 28,400 dwellings in accordance with the Inspector’s Further Interim Conclusions. However, the proposed distribution of development is not supported.

Paragraph 57 of the Inspector’s Further Interim Conclusions confirms that the projected dwelling requirement for the plan period is 28,370 dwellings and identifies what proportion of this need arise from the objectively assessed need of each of the SWDP’s local authority areas. The housing breakdown is as follows.

1) Malvern Hills – 8,590 dwellings
2) Worcester City – 9,830 dwellings
3) Wychavon District – 28,370 dwellings

In terms of deliver of the overall housing requirement Main Modification PM9 adopts the following approach:

1) Wider Worcester Area (in Worcester City) – 6,750 dwellings
2) Wider Worcester Area (in Malvern Hills and Wychavon) – 5,450 dwellings
3) Malvern Hills – 5,600 dwellings
4) Wychavon – 10,600 dwellings

The redistribution of housing in the main modifications seeks to direct a significant proportion of Malvern Hill’s housing requirement (2,990 dwellings (8,590 – 5,600)) to the Wider Worcester Area adjacent to the built up edge of Worcester City. This is due to perceived constraints to housing delivery.
in Malvern Hill District. We are of the view that the proposed approach is inappropriate. In the first instance the housing should be provided where the need is generated, which is the main towns and settlements right across the rural Malvern Hills District. The distribution of development should be amended so that an increased proportion of Malvern Hills objectively assessed housing need is met at Malvern Hills major settlements.

We suggest that the quantum of housing directed to the Wider Worcester Area should be decreased by 1,000 dwellings, and the quantum of housing in Malvern Hills, excluding the wider Worcester Area, is increased by 1,000 dwellings. The South Worcestershire SHLAA clearly demonstrates that Malvern Hill’s main towns and villages have ample capacity for additional growth at the Category 1 and 2 villages. There are no insurmountable constraints which would be prevent development at these main settlement locations.
Additional sheet for responses to individual modifications – to be appended to main form as required

Part B

Please set out what change(s) you consider necessary to make the Proposed Modification legally compliant or sound, having regard to the test(s) you have identified above. You will need to say why this change will make the Proposed Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Your representation should relate only to the current Proposed Modifications.

The housing requirement for the Malvern Hills areas, excluding wider Worcester, should be increased by 1,000 dwellings. The housing requirement for the Wider Worcester Area should be decreased by 1,000 dwellings. This is considered to be the most appropriate strategy, when considered against the alternatives. It ensures that new housing is provided at Malvern Hill’s main settlements where the housing requirement is generated.
South Worcestershire Development Plan Examination

Representation Form – Additional Pages
Consultation on Proposed Modifications to SWDP: 6 October – 14 November 2014

South Worcestershire Councils

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<th>PM12</th>
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5. Do you consider the Proposed Modification to be legally compliant?

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- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.
As referred to in our representations to Main Modification PM9 we are of the view that the housing requirement should be redistributed so that Maven Hills meets a greater proportion of its own objectively assessed housing requirement at its principal settlements. It is our view that 1,000 dwellings should be diverted from the Wider Worcester Area to Malvern Hills (excluding the Wider Worcester Area).

If our suggested approach is adopted it has implications for the distribution of development identified in replacement table 4e. In our view the additional housing in the Malvern Hills area should be directed towards the most sustainable locations.

In this regard it is noted that Malvern town receives a substantial amount of development. The number of completions in Malvern has increased from 1,326 to 1,686 since the Submission plan was produced. Furthermore there are new allocations at Land at Mill Lane Poolbrook, Lower Howsell Road allotments, Pickersleigh Grove, the Railway Sidings at Peachfeild Road, Victoria Road car park, Brook Farm Drive, Broadlands Drive and Barracks Store. Between them these sites will deliver an estimated 366 dwellings. Furthermore the Quinetiq allocation has been increased by another 50 dwellings. That being the case, whilst some of the proposed additional development should be directed towards Malvern we are of the view that a proportion of the increased housing target should be directed to other sustainable settlements. This will ensure that there is a broader distribution of housing and that new homes are planned for, and constructed, at settlements which have a good range of local services and which are capable of accommodating further development closer to where the need arises.

The number of dwellings allocated at Tenbury Wells has more than doubled from 70 to 162. Furthermore development at Tenbury Wells is constrained by the floodplain. It is, therefore, appropriate to direct additional development to Malvern Hill’s category 1 and 2 villages. The SWDP SHLAA identifies a number of sites adjacent to the Category 1 and 2 villages that are considered to be suitable and sustainable locations for development. These sites should be allocated for development to meet
Malvern Hill’s housing needs in the area where it arises. This will help to reduce the need to travel and is considered to be the most sustainable way of meeting Malvern Hills housing requirement when compared to the other strategies.

The Malvern Category 2 village of Leigh Sinton has one allocation of 53 dwellings (Land at Kiln Lane). This site now has planning permissions. It is our view that it is appropriate for an additional site to be identified at Leigh Sinton. Leigh Sinton is a sustainable location for development. The South Worcestershire Village Facilities and Rural Transport Study confirms that Leigh Sinton is heavily influenced by the services and facilities offered in Malvern. It is advised that the village has a general store, public house, café and restaurant, a church, employment opportunities and access to a mobile library. As detailed in our representations to PM223 our client controls land at Leigh Sinton that is a sustainable and deliverable housing site and is suitable to be allocated for development in the emerging plan (Site location plan attached). The SHLAA edition confirms that the site is a sustainable location for development.
Part B

Please set out what change(s) you consider necessary to make the Proposed Modification legally compliant or sound, having regard to the test(s) you have identified above. You will need to say why this change will make the Proposed Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Your representation should relate only to the current Proposed Modifications.

As detailed in our representations to PM9 the housing requirement for Malvern Hills, excluding the Wider Worcester Areas, should be redistributed so that a greater proportion of Malvern Hill’s objectively assessed housing need is met at Malvern Hill’s main towns and villages. Given the existing distribution of development and constraints to development at Malvern, Upton Upon Severn and Tenbury Wells, it is appropriate for further allocations to be made at Malvern Hills Category 1 and 2 villages, specifically Leigh Sinton.

This will ensure that there is a broader distribution of housing and that new homes are planned for, and constructed, at settlements which have a good range of local services and which are capable of accommodating further development closer to where the need arises.
South Worcestershire Development Plan Examination

Representation Form – Additional Pages
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South Worcestershire Councils

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4. Which Proposed Modification does your representation relate to?

| Modification No. | PM14 |

5. Do you consider the Proposed Modification to be legally compliant?

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Part A

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Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the Proposed Modification please also use the box below to set out your comments.

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The new text introduced by amendment PM14 is imprecise and will not ensure that a five year supply of housing is maintained. We also have concerns about the way in which PM27 suggests that the five year housing land supply calculation for each authority area will be undertaken.

The Framework requires local authorities to maintain a five year supply of deliverable housing land (paragraph 47). The proposed amendment advises that the South Worcestershire authorities will maintain a rolling five year supply of housing in accordance with the sub totals set out in Table 4b. Table 4b gives a housing requirement for Worcester City, the Wider Worcester Area, Malvern Hills District and Wychavon District.

For the purposes of maintaining a five year supply of housing land, and the five year housing land supply calculation, it is not clear how the Wider Worcester Area figure outside of Worcester City will be dealt with. It is imperative that this is clear in the plan in order to help ensure delivery. In our view Malvern Hills and Wychavon District should factor their proportion of the Wider Worcester Area housing requirement outside of Worcester City's administrative area into their five year housing land supply calculation as they are the delivery authorities.

In this regard it is useful to note that this is the approach taken in Blaby District in Leicestershire. A significant proportion of Blaby District's housing requirement relates to the delivery of a large urban extension to meet the needs of Leicester. It has been well established through a series of appeal decisions that whilst the Leicester urban extensions proportion of Blaby's housing requirement does not relate to the objectively assessed housing needs of Blaby District it must be take into account in Blaby District's five year housing land supply calculation.
**Part B**

Please set out what change(s) you consider necessary to make the Proposed Modification legally compliant or sound, having regard to the test(s) you have identified above. You will need to say why this change will make the Proposed Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Your representation should relate **only** to the current Proposed Modifications.

PM14 and PM27 should be amended to confirm that each authority will maintain a rolling five year housing land supply. In undertaking the five year housing land supply calculation each local authority area will use the total quantum of housing that is expected to be delivered in its administrative area as the starting point.

It is essential that the Wider Worcester Area proportion of the housing requirement that is expected to be delivered in Malvern Hills and Wychavon District is factored into the respective authorities’ five year housing land supply calculation. As the delivery authorities, Malvern Hills and Wychavon need to monitor the progress of the Wider Worcester Area distributed figure though their five year housing land supply calculations.

Adopting this approach will help to ensure that the plan is positively prepared and based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.
South Worcestershire Development Plan Examination

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5. Do you consider the Proposed Modification to be legally compliant?

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As mentioned above, these are the tests of soundness to which your comment(s) should relate:

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Additional sheet for responses to individual modifications – to be appended to main form as required

Part A

Please use a separate sheet for each reference number.

Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the Proposed Modification please also use the box below to set out your comments.

Please note - your representation should provide evidence and information to support / justify your representation and any suggested change.

Your representation should relate only to the current Proposed Modifications.

As detailed in our response to PM1 whilst there may not be any evidence that South Worcestershire will be required to accommodate development requirements from neighbouring authorities at the present time this position could change. The greater Birmingham and Solihull LEP are currently in the process of preparing a Growth Study that will, amongst other things, develop a strategy for meeting Birmingham’s significant housing requirement. It is quite possible that this work will result in a need for South Worcestershire to accommodate additional development.
Part B

Please set out what change(s) you consider necessary to make the Proposed Modification legally compliant or sound, having regard to the test(s) you have identified above. You will need to say why this change will make the Proposed Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Your representation should relate **only** to the current Proposed Modifications.

<table>
<thead>
<tr>
<th>Main Modification PM20 should be amended to read:</th>
</tr>
</thead>
<tbody>
<tr>
<td>&quot;The housing provision targets in Table 4b relates to South Worcestershire’s objectively assessed housing needs. No allowance is made to meet the growth requirement of other local authority areas. If new evidence arises that indicates that the South Worcestershire Authorities are required to help meet the growth requirements of other local authority areas the South Worcestershire Authorities will actively work with the relevant authorities to assist in meeting this requirements. &quot;</td>
</tr>
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Additional sheet(s) for responses to individual modifications – to be appended to main form as required

Please use a separate sheet for each modification response to enable the Inspector to consider your comments on each modification as promptly as possible.

Consultation runs from Monday October to Friday November 2014. All comments should be received by 5.00pm on the November.

(The following form can be edited electronically by clicking into the boxes and typing – boxes should automatically expand as needed. Cursor marks will not affect the text or readability of the document)
South Worcestershire Development Plan
Proposed Modifications: 6 October – 14 November 2014

Please use a separate sheet for each modification number.

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<tr>
<td>John Williams, PlanIT Planning and Development ltd</td>
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4. Which Proposed Modification does your representation relate to?

<table>
<thead>
<tr>
<th>Modification No.</th>
<th>PM21</th>
</tr>
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5. Do you consider the Proposed Modification to be legally compliant?

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</tr>
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6. If you consider the Proposed Modification to be unsound, please identify which test of soundness your comments relate to? (tick all that apply)

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As referred to in our representations to Main Modification PM9 we are of the view that the housing requirement should be redistributed so that Mavern Hills meets a greater proportion of its own objectively assessed housing requirement at its principal settlements. It is our view that 1,000 dwellings should be diverted from the Wider Worcester Area to Malvern Hills (excluding the Wider Worcester Area). The housing requirement should be met where the need arises as far as possible. This approach reduces the need to travel and encourages sustainable patterns of development.

Part 'b' of the proposed additional text confirms that part of Malvern Hill’s objectively assessed housing requirement has been directed to the Wider Worcester Area due to ‘natural and environmental constraints’ and because ‘Malvern Hills has limited ability to accept new development’. This suggests that if sites are available in Malvern Hills District which are not constrained, they should be the preferred location for development.

As detailed in our representation to PM223 our client controls land at Leigh Sinton (c3.25 hectares) that is suitable for development (Site location plan attached). The development of that site is not constrained by technical or environmental constraints. Leigh Sinton is a sustainable location for development, demonstrated by its status as a Category 2 village and by the fact the Malvern Hills has recently granted planning permission for a 53 dwellings development in the settlement. Our client’s site is available to meet Malvern Hills housing requirement in the short term. Its development will assist in meeting the housing need where it arises.
Part B

Please set out what change(s) you consider necessary to make the Proposed Modification legally compliant or sound, having regard to the test(s) you have identified above. You will need to say why this change will make the Proposed Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Your representation should relate only to the current Proposed Modifications.

The proposed text should be amended to reflect the comments in our PM9 representations so that the housing requirement for the Wider Worcester Area is reduced by 1,000 and the housing requirement for Malvern increased by 1,000.
South Worcestershire Development Plan Examination

Representation Form – Additional Pages
Consultation on Proposed Modifications to SWDP: 6 October – 14 November 2014

South Worcestershire Councils

Additional sheet(s) for responses to individual modifications – to be appended to main form as required

Please use a separate sheet for each modification response to enable the Inspector to consider your comments on each modification as promptly as possible.

Consultation runs from Monday  October to Friday  November 2014. All comments should be received by 5.00pm on the  November.

(The following form can be edited electronically by clicking into the boxes and typing – boxes should automatically expand as needed. Cursor marks will not affect the text or readability of the document)

SWCs: October 2014
South Worcestershire Development Plan
Proposed Modifications: 6 October – 14 November 2014

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Part A

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PM223 seeks to introduce a single new housing allocation at Leigh Sinton that can provide 53 dwellings. We are of the view that this is an inadequate quantum of housing and additional development should be directed towards Leigh Sinton (site location plan attached). As detailed elsewhere in our representations the quantum of housing directed to Malvern Hills district, and in particular the largest towns and villages, by the emerging SWDP should be increased. A disproportionate amount of Malvern Hills objectively assessed housing requirement is directed towards the Wider Worcester Area. This is due to a perceived lack of available sites for development. There are, however, suitable and sustainable opportunities to deliver additional development in Malvern Hills on land such as my clients site at Leigh Sinton.

The attached plan shows the location of our clients’ site at Leigh Sinton which we believe should be allocated for development in the emerging plan. The site is outside of, but adjacent to, the Leigh Sinton settlement boundary as defined by the Malvern Hills District Local Plan Proposals Map. The Local Plan settlement hierarchy was drawn up to reflect the sustainability credentials of the District’s rural settlements. The adopted Local Plan identifies Leigh Sinton is a Category 1 settlement, where development is first located in rural areas. Whilst Leigh Sinton is identified as a Category 2 village in the emerging plan it is still considered to be a sustainable location for development. All SWDP Category 2 settlements have at least two key services including a shop and have access to at least daily services for employment and shopping purposes.

The South Worcestershire Village Facilities and Rural Transport Study confirms that Leigh Sinton has a general store, public house, café and restaurant, a church, employment opportunities and access to a mobile library. It has good access to the services and facilities offered in Malvern, which is approximately 3km to the south. The 417 bus service provides relatively frequent connections to Malvern Hills and Worcester City.
In terms of the site itself the SHLAA Edition confirms it to be a suitable location for development. The site is identified as SHLAA site MHLS09 - Land adjacent Moat Farm Nursing Home, Stocks Lane. The SHLAA proforma confirms that the site is potentially available and suitable for development within a five year period. Whilst it is advised that access arrangements need careful consideration we are of the view that access is not an obstacle to the development of this site. The SHLAA advises that the site is a ‘prominent site on edge of village’ however this must considered into the context that the SHLAA concludes that the site is a suitable location for development.

In conclusion the site has been assessed as part of the SHLAA process and has found to be a suitable housing site. Leigh Sinton is a sustainable location for development, reflected by its status as a Category 1 village in the adopted Local Plan and a Category 2 village in the emerging SWDP. The emerging SWDP advises that a significant proportion of Malvern Hill’s housing requirement has been directed toward the Wider Worcester Area due to a lack of suitable housing sites. However, the land in my clients control is a suitable housing that can be allocated for development in the short term.
Part B

Please set out what change(s) you consider necessary to make the Proposed Modification legally compliant or sound, having regard to the test(s) you have identified above. You will need to say why this change will make the Proposed Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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PM223 should be amended to include an additional housing allocation at Leigh Sinton. My clients’ site, Land adjacent Moat Farm Nursing Home, Stocks Lane, should be allocated for development in the emerging SWDP.
Green Study to Barracks in 1984.