
South Worcestershire Development Plan
Civic Centre
Queen Elizabeth Drive
Persnore WR10 1PT

15th December 2019

Dear Sir/Madam

Comments on the SWDP Review Preferred Options

General The proposed new developments are, perhaps inevitably, situated on the edge (or even beyond the current outskirts) of Malvern. The access to all of them are via narrow roads (or roads that are narrowed by parked cars) or country lanes. We have concerns over transport (both roads and public transport), education (even if existing facilities can cope there is danger of further stress on transport facilities as developments are extending further beyond the town), and also concerns about medical and other facilities.

The Council's own documents have drawn attention to the shortage of jobs in Malvern and that wages appear relatively low by comparison with cost of housing - leading to imbalance and need for travel. New housing and employment areas should be together if possible to avoid commuter travel or at least be close to railway stations and public transport links. In these preferred options the major housing site is on the opposite side of Malvern to the new employment areas.

Transport links for Malvern to other parts of Worcestershire and the Midlands are not as robust as would be desired. Experience has shown that flooding or any other exceptional event can lead to Malvern becoming difficult to access via the limited major routes, and the minor roads do not provide a practical alternative. The railway service could, and should be, improved although it is difficult to see how this can be done without very significant investment (e.g. re-instatement of crossovers at Worcester Foregate Street and improvements at Worcester Shrub Hill and doubling of the Cotswold Line - both towards London and Hereford). Bus services are an issue for those wishing to travel outside of peak times or other than between Malvern and Worcester.

Specific Comments

Paragraphs 3.1-3.2 While the sentiments in these paragraphs are clearly unarguable, it is unclear that the subsequent paragraphs will deliver this vision for Malvern. While we are fortunate in having two railway stations, overall the transport infrastructure leads to most Malvern residents using cars and creating traffic congestion. Significant changes will be required to create an environmentally friendly transport infrastructure that works for residents and those that work in Malvern, many of whom have to travel a range of distances from walkable through to long distance commuting.

Paragraph 3.7 Stronger Communities Malvern already suffers from having a lack of clear “town centre” focus or even a centre of community in some of its more isolated areas that lack facilities. With the proposals for effectively extending the boundary of Malvern further, serious thought needs to be given to providing a sense of place and community. Local facilities (medical, educational, retail and employment) will help. Neighbourhood plans may also define ways to build this sense of place.

SWDPR 3: Strategic Transport Links While this represents a start it is far from clear that the schemes identified in F (and the other interventions in LTP4) will support the increased transport needs associated with the additional housing and employment planned in Malvern in the current and proposed plans.

SWDPR 7: Health and Wellbeing We support this new policy.

SWDPR 25: Design This no longer contains reference to “Neighbouring Amenity” - i.e. adequate level of privacy, outlook, sunlight and daylight. It is presumed that this is covered by the NPPF and other requirements.

Comments on Specific Allocations

SWDP NEW 90: Land at Cales Farm (CFS0482) This is very close to the AONB and certainly within the setting of the AONB. Such a significant development of this size will harm the landscape and scenic beauty of the AONB and its choice appears in conflict with the aims of the SWDPR.

Such a large development is likely to lead to very much increased traffic on local roads that are totally inadequate to carry the traffic. This site has poor connectivity generally with the major travel routes in Malvern.

There are sensitive nature conservation features within and adjacent to the site - Whippets Brook and Mill Copse that are likely to be affected by such a large development.

The Worcestershire Way - a significant trail in the County passes close by but the amenity of views from the Way will be impacted by the presence of such a large development.

If such a large development goes ahead then education and medical facilities need to be provided locally otherwise the transport impacts will be even more extensive with children probably being taken by car to other locations in Malvern creating further congestion and pollution.

SWDP NEW 91 Land at 186 Madresfield Road (CFS0518) While this is a small development there is the question of access to this site.

SWDP NEW 89 Land south of Madresfield Road (CFS0407sc) There is a question of access for this site. This would be a large development generating significant traffic on essentially rural lanes. Given the size of the development consideration would need to be given to educational and medical facilities. The impact on views from the AONB should also be considered.

SWDP NEW 92 Land on the south side of Guarlford Road (CFS00905sc) There is a question of access for this site. Mill Lane is a narrow lane on Commons Land owned by MHT and will not be easily widened. A large increase of traffic on this lane will cause problems and the junction with Guarlford Road is likely to become a problem. The site is close to the sewage works which is not necessarily the best environment. Again with the number of houses, provision of education and medical facilities will need consideration. The views from the Guarlford Road have been a major consideration in previous discussions on planning and this development would require significant screening.

SWDP NEW 109 Land at Mayfield Road (CFS01097a) and SWDP NEW 109 Land at Mayfield Road (CFS01097b) These employment sites would be visible from the AONB and would need to take account of the appropriate AONB guidelines. The land is adjacent to Commons land owned by MHT and so access may be constrained. Mayfield Road and North End Land are narrow country lanes and, given the ownership of the adjacent land, it may be difficult to upgrade the roads, or the junction, making development and use of this site as a major employment location challenging.

Thank you for your consideration.

Yours faithfully

(Signed)

Stephen Goodenough
Chairman of the Planning Sub-Committee
For and on behalf of Malvern Civic Society