

The response of Martley Parish Council to the SWDPR Preferred Options report

This is the response by Martley Parish Council to the Preferred Options draft of the South Worcestershire Development Plan Revision (SWDPR). The Parish Council has based this response on the outcome of consultation with citizens of the Parish through a public meeting on the 30th November 2019 which was attended by 73 people, and by subsequent social media contacts. However, the Parish Council is concerned that the limited time available for consultation has made it difficult to fully analyse the implications of a 200-page report and its 16 technical appendices.

Vision and objectives of the SWDPR

Martley Parish Council supports the Vision and Objectives of the Preferred Options report with the following exceptions:

1. Vision paragraph 3.3 fails to take sufficient account of the importance of farming in producing food needed for expected population growth. It is recommended that this sections includes the following statement: “The need to protect these vital and sensitive landscapes and environments is enshrined within the SWDPR. Not only is a healthy and bio-diverse countryside the cornerstone of south Worcestershire’s continued success as a place in which to live, work and relax, it is the foundation stone for a productive agricultural sector that is essential to the nation’s ability to feed itself and as such, is a core component of sustainable development”.
2. Objective 9: ‘To provide a basis for neighbourhood plans’ is vacuous and should be replaced by a firmer commitment: ‘To respect the policies of adopted neighbourhood plans’.
3. Objectives 10 should be amended by adding ‘and to preserve the rural character of country villages by promoting their organic development rather than large suburban estates’.

Housing targets

The Parish Council recognises that the Joint Planning Team are constrained by the standard method recommended by the MHCLG for calculating the number of additional dwellings. However, it notes that the detailed sensitivity analysis completed by ARC for the SWDPR Evidence Base found a maximum requirement for new dwellings/year in Malvern Hills District substantially below that required by the standard method¹. This was based on ONS data published in 2018. More recent ONS data on the projected increase in households and the workplace-based median price to income-affordability ratios, if

applied to the standard method, would result in a reduced housing target². Recent research has found that ONS projections of household formation have over-estimated demand for new dwellings, while official statistics substantially under-estimate additions to the stock of housing³.

The importance of preventing excessive construction, particularly in rural sites is confirmed by the Sustainability Appraisal completed for the SWDPR Evidence Base. This found that such development proposals have a negative impact on the local landscape:

“This is primarily due to the large proportion of the sites located on previously undeveloped land, which would be expected to lead to a significant change to the local landscape character, as well as increasing the risk of the urbanisation of the countryside”⁴.

And:

“The majority of the development proposals would be likely to result in adverse impacts in regard to air quality and noise to some extent. This is primarily due to the scale of the development proposed, with development proposals of ten residential units or more, or non-residential development comprising 1ha or more, being likely to result in an increase in air pollution in relation to current levels. This increase would be largely due to the construction of the development and the likely increase in vehicles associated with new housing.”⁵

It is therefore recommended that the housing targets included in the Preferred Options Draft be reviewed with the aim of minimising unneeded development, particularly in rural areas.

Housing mix

Martley Parish Council welcomes the policies in the SWDPR which aim to improve the housing mix for both the affordable and market sectors. These include: SWDPR14 which continues the previous SWDP requirement that all developments of six or more dwellings in rural areas include a minimum of 40% affordable houses; SWDPR13 requiring all developments of more than five dwellings to include a mix of market housing informed by neighbourhood plans and the Strategic Market Housing; SWDPR16 requiring 20% of dwellings to be accessible for disabled people in all developments of twenty or more dwellings; and SWDPR22 requiring all sites of five or more dwellings to include housing suitable for the elderly as part of their market housing. This is important because developers are increasingly reluctant to construct dwellings suitable for elderly people. Less than 2500 bungalows are now built each year in the UK⁶. Yet ONS data shows that the main cause of the increase in the number of dwellings is greater longevity and a consequential rise in the number of households comprising elderly residents and especially households of single old people⁷. This also applies to ‘affordable housing’, where the estimated need in Malvern Hills District is 57 dwellings/year of which 65% are for one-bedroom accommodation⁸. A particular factor in rural areas is the geographical isolation of many elderly people living away from village centres and therefore

experiencing increasing difficulty in accessing local services such as shops, general medical practitioners and public transport. There is therefore likely to be growing requirement for adapted single-storey housing, both owned and rented, close to the village centre. Failure to provide dwellings of this kind will reduce the capacity of elderly and infirm people to remain in their own homes and hence place greater strains on adult social services.

These policies in the SWDPR which regulate housing mix, although welcome, have a significant weakness when applied to developments in country villages. These often expand by windfall developments such as gap-filling and conversions of redundant farm-buildings. These almost always fall below the threshold set in SWDPR14 and similar policies for ensuring an adequate housing mix. In some cases, developers could avoid reaching such thresholds by salami-slicing development, such that a sequence of small numbers of houses are built over several years on a single plot. It is therefore recommended that a new policy address this problem by requiring all new developments in rural areas to demonstrate that they meet local need, in particular for: properties with one or two bedrooms to meet the needs of single people, first-time buyers and people with small families; and properties designed to be suitable for the elderly located near key facilities.

Allocation for Martley

Martley Parish Council opposes SWDPR55 which allocates a site for 71 houses in a field Of 3.93ha South of the playing field on the outskirts of the village. The reasons are summarised in the SHELAA assessment completed for the SWDPR⁹:

1. Conflict with Neighbourhood Development Plan.

The SHELAA assessment notes that such an allocation conflicts with the Martley, Knightwick and Doddenham Neighbourhood Plan, which was adopted in January 2018. Specifically, it conflicts with policies MKD1 (Landscape Design Principles), MKD4 (Maintaining the Settlement Pattern) and MKD8 (Local Green Spaces). The assessment notes that the allocation also would obscure Key View 2 (outside the Conservation Area), which looks out from the village to the Iron-Age fort on Berrow Hill. A development on this site would also obscure Key View 3 (outside the Conservation Area), which looks across the village to Woodbury Hill and which many local people regard as one of the finest views in the County. These views are shown on the next page. It should also be noted that a development on this site would almost eliminate the gap between Martley village and the hamlet of Berrow Green. The proposed development thereby conflicts with draft policy SWDPR25Biii: “The distinct identity and character of rural settlements should be safeguarded”.

2. Loss of best and most-valued agricultural land (BMVAL).

The SHELAA assessment notes that the proposed site is Grade 2 on Agricultural Land Classification and therefore counts as ‘best and most-valued agricultural land’. Development on this site therefore conflicts with SWDPR Objective 14: “To protect,

restore and enhance biodiversity by delivering biodiversity net gain, and to enhance geodiversity, landscape quality, water quality and protect the highest quality agricultural land”.



3. Impact on local healthcare services.

The SHELAA assessment notes that this development will have a “large and/or cumulative impact on health services including ability to register with a GP practice. Community

health care may be impacted. Acute trust provision would need to be addressed (including shortfall in allocation of beds/staff for the financial year in which the development is built)". The *Infrastructure Study and Delivery Plan* completed for the SWDPR notes that severe underprovision of primary care services will result and that the the Clinical Commissioning Group has estimated that the Great Witley Surgery (which serves Martley and much of the Teme Valley) is 'Assessed as lacking capacity to meet current growth'. Current list size is 6800, which is expected to expand to 7291 by the end of the Plan period if all the proposed developments are implemented. The gross internal area (GIA) of the practice in Great Witley is 381m², while the needed GIA is 706m².¹⁰ Under-provision of primary-care services can become a major problem in rural areas because the unavailability of registration with a nearby GP practice may require extended travel.

4. Flooding.

The SHELAA assessment found that the North-east and centre of site is susceptible to surface-water flooding. The picture below shows a sight which occurs every Winter. Water from the field often floods gardens in neighbouring houses.



A further problem with development on this site is that it conflicts with SWDPR3:

"Development proposals, taking into account their location, must demonstrate that: the proposed layout and design will minimise the need to travel by car, offer genuinely sustainable travel choices, maintain and, where possible, enhance highway safety for all users, and be consistent with the delivery of the objectives in

The SWDPR and the *Infrastructure Study and Delivery Plan* do not estimate the impact on private car usage of each proposed development¹¹. However, it is known that people living in rural areas travel twice as far each year than those in towns, and that 88% of all travel in rural areas is by car compared with 69% in most urban areas¹². Martley does have an infrequent bus service to Worcester, but local surveys carried out for the Neighbourhood Plan found that only 4% of residents used a bus to travel to work. This is probably because the last bus leaves Worcester at 1740 and only operates for six days/week. No improvement in local bus services is proposed in the *Infrastructure Study and Delivery Plan*. As a result, the proposed development in Martley would result in a major increase in motor vehicle traffic through the centre of the village and along the narrow lane between the Chantry Academy and the Primary School. DEFRA data indicates that each rural inhabitant makes 780 trips by car/year¹³. The majority of new householders will have two or more cars, so that a development of 71 houses with a mean occupancy of 2.5 indicates that the proposed development in Martley will result in an estimated additional 100,000 car journeys/year.

The proposed development in Martley is part of a wider inconsistency with the SWDPR. Despite the stated intention of minimising travel by car to contribute to 'sustainability', the Preferred Options draft proposes an allocation (including sites re-allocated from the SWDP but not yet built) of 425 dwellings in the Teme Valley from Martley to Tenbury Wells. This is an area with narrow and winding roads, no motorways or railway lines, very limited employment opportunities and few bus services. It is difficult to see how the substantial number of new dwellings proposed for this area by the Preferred Options report meets the draft policy SWDPR3 or constitutes 'sustainable development'.

Against the stated disadvantages of the proposed development in Martley, the SWDPR presents no reasons or evidence in favour of the site. Martley village has a population distribution similar to that for Malvern Hills District as a whole, but has grown at a faster rate than the District in the last decade. The SWDP allocated 65 dwellings for the village, all of which were completed within two years of the publication of the Plan. Since then, a further 12 dwellings have either been completed, are under construction or have received planning permission. The latter are scattered over five different sites. This pattern of incremental growth helps preserve the rural character of the community more than the construction of large standardised housing estates of suburban houses. It is therefore recommended that the allocation of 71 houses South of Martley playing field be cancelled.

Phasing development

The SWDPR will cover a longer time period (of 20 years) than the SWDP, but does not include any phasing of development other than that proposed for Rushwick. This means that the Plan would allow all the remaining sites allocated for development to be built

within a few years of adoption. This is unlikely to happen for the whole of South Worcestershire because the rate of construction is determined by consumer demand and ultimately by the availability of mortgage finance. However, some villages are under pressure from developers and would probably see planning applications submitted very soon after the final adoption of the SWDPR. In such cases, the next round of the local plan (presumably to be adopted in 2026) may include further development proposals for the same villages. There is therefore a risk of a ratchet of additional housing estates every five years, resulting in the suburbanisation of large tracts of the countryside. To avoid this fate, it is recommended that the SWDPR include a policy to prevent the over-development of villages. This would involve setting a target for the number of new dwellings permitted in each village, based on the ONS prediction of the rate of increase in households on its baseline population plus a margin (such as 20%) to account for growth in surrounding rural areas and strategic growth. There would be a moratorium on planning approvals for new dwellings in a village whenever the accumulated target since the start of the plan period has been exceeded.

Conclusions

Martley Parish Council is disappointed that the work involved by the community to develop its neighbourhood plan has been disregarded by the planning team which prepared the Preferred Options report. An inappropriate site has been designated for a large new housing estate, which, if constructed, would adversely affect the lives of our people. We hope that future drafts of the SWDPR incorporate our recommendations and are based on an improved spirit of collaboration with the local communities in South Worcestershire.

Martley Parish Council
12 December 2019

Notes

1. Bullock M (2018) *Housing Need in South Worcestershire*. Edge Analytics.
https://www.swdevelopmentplan.org/?page_id=14124. Accessed 1st October 2019.
paragraph 1.26. Accessed 7 December 2019.
2. Office of National Statistics (2019) *House price (newly-built dwellings) to workplace-based earnings ratio*.
<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/housepricene wlybuiltdwellingstoworkplacebasedearningsratio>. Accessed 7 December 2019.
3. Mulheirn I (2019) *Tackling the UK housing crisis: is supply the answer?* UK Collaborative Centre for Housing Evidence, London.

4. Lepus Consulting (2019) *Sustainability Appraisal for the South Worcestershire Development Plan Review*, 5.1.7. Accessed 7 December 2019.
5. *Ibid*, paragraph 5.1.8.
6. Arthur Online (2018) Nationwide demand for bungalows. *Industry Insight*, September 11th, 2018.
<https://www.arthuronline.co.uk/blog/property-news/nationwide-demand-for-bungalows/>. Accessed 1st October 2019.
7. Office of National Statistics (2018) *Household projections for England – household type projections: 2016-based. Indication of the future number of households in England and its regions and local authorities*, Table 5.
<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/2016basedhouseholdprojectionsinengland/2016based#regional-comparisons>. Accessed 1st October 2019.
8. Bullock M (2018) *op cit*, Table 1.5.
9. *SHELAA site assessments: Martley* (2019).
https://www.swdevelopmentplan.org/?page_id=14734. Accessed 7 December 2019.
10. *Ibid* p67.
11. Ove Arup (2019) *Infrastructure Study and Delivery Plan*, p20.
12. DEFRA (2019) *Statistical Digest of Rural England*, pp85-86.
13. *Ibid*.