

Land at (OS 8894 6544) Kidderminster Road, Hampton Lovett

Representation prepared by:

Mrs J Suffield

Doverdale Park Homes

Hampton Lovett

On behalf of residents and Doverdale Park Homes Residents' Association

We are against the Appeal Proposal and the following is our representation.
All previous submissions still stand.

BOUNDARY COMMISSION REVIEW

The Boundary Commission considers that Doverdale Park is a rural settlement and published their final draft recommendations on 16 September 2022, retaining Doverdale Park Homes within Hampton Lovett, as stated below:

“Ombersley

47 We received multiple representations regarding our proposal to place the Doverdale Park area within a Droitwich-based ward. ...provided evidence that Doverdale Park had a rural community identity, which would not be reflected by placing it within a Droitwich-based ward.

48 ...strong evidence that the community identity of Doverdale Park looks towards the remainder of Hampton Lovett parish. We therefore propose to place Doverdale Park in Ombersley ward, which now contains the entirety of Ombersley, Doverdale, Westwood and Hampton Lovett parishes.”

TIMELINE OF PLANNING EVENTS

- 2014-2017 - Surveys conducted on field adjacent to Doverdale Park
- April 2015 - Doverdale Park Residents' Association reassured by local Parish Council that the proposed site would not be built on for at least 15 years
- Aug 2015 - Hampton Lovett Parish Council queried reason for site surveys and reassured park's Residents' Association that no housing planned and nothing being progressed for at least 15 years
- Aug 2017 - Plotted plan shown to local community at Hampton Lovett Parish Rooms by Hunter Page Planning Ltd. Inaccuracies in plotted plan pointed out by local residents. Some homes had been omitted.
- 7 Aug 2017 - Planning Application 17/01631/OUT for up to 144 units (reduced from 181)
- 26 Apr 2018 - Consultation end date (extended)
- 18 Jun 2018 - Planning Application refused (after a time extension)
- 2-3 Jul 2018 - Archeology trenches dug close to flood plain and railway embankment
- 4 Jan 2019 - Start date of Appeal APP/H1840/W/18/3218814
- 8 Oct 2019 - Inquiry start date
- 28 Jan 2020 - Appeal dismissed

- 3 Feb 2022 - Start date of Planning Application W/22/00210/OUT for up to 102 units
- 16 Jun 2022 - Highways Department recommend deferral pending further information
- 9 Sep 2022 - Appellant's response to Highways recommendations published online
- 9 Sep 2022 - Appeal start date, due to non-determination by Wychavon District Council and alleged deficit of 5 year housing land supply
- 12 Sep 2022 - Appeal Application and Presentation of Case published online

The above timeline indicates that there has been an ongoing planning issue for at least the last 8 years, the only respite being from the Appeal dismissal late January 2020 until current Planning Application February 2022. That respite overshadowed by stress of world pandemic. The threat of adjacent development has proved a great source of unwanted and distressful anxiety to all local residents. This has been strongly emphasised by those residents throughout that time, but does not appear to be given great significance.

Recent timings to publish documentation coincided with the passing of HM the Queen, beginning less than 24 hours after her death, requiring examination of issues raised, proving a distressing, unwelcome intrusion into the sad period of national mourning. By contrast, much Council business was postponed out of respect around that sensitive time.

RESPONSE TO APPELLANT'S CASE

- 1 Application to develop site refused previously and an appeal dismissed, due to "character and appearance of local area, especially landscape", "woodland and field pattern", stated by the Inspector. Those issues still exist, in spite of reduction in plan scale. Different layout, homes and internal roadways too close to homes and gardens of Doverdale Park, with its "own character in the countryside", "part of the characteristic of Hampton Lovett, specific and well-defined, even though not characteristic of the landscape character type." Other dwellings "dispersed settlement" and modern urban dwellings would be "at odds with mobile homes, agricultural land and dispersed dwellings, and linear and wayside dwellings".

Location outside of Droitwich Development Boundary both in previous and newly reviewed SWDP 2022, another "emerging plan", therefore "site in open countryside", according to previous Inspector. Still not suitable for development.

Hampton Lovett classification is Category 4 village. In the current review, this category is not included in development plans, considered less sustainable.

Sustainability is core strategy for planning future developments, in response to climate change and energy issues, proximity to rail and road networks, infrastructure and amenities, in order to minimise travel.

Urban areas, Category 1, 2 and 3 villages considered more sustainable for travel and better access to more amenities.

More than 250 dwelling units, including some affordable, approved/pending so far to date in 2022 in immediate Droitwich area, including 127 units recently approved at Impney Hall site. Brownfield sites within town are earmarked for housing developments, with ready access to services and amenities.

SWDP Review scope up to 2041 in phases, planning for more than 13,000 dwelling units, which is in excess of the required housing supply.

- 2 Heritage assets will be affected, in spite of plans to enhance their presence.

Grade 1 Hampton Lovett Church and graveyard memorials need to be preserved in their current historic setting without modern buildings intervening in that setting from any direction. Significance of “understanding of the history of the building”.

Viewpoints from the church lychgate, churchyard, Doverdale Park, The Forest, Monarch’s Way, Public Right of Way and bridleway, A442 and footpath on its eastern side would all lose the current and historic view, sense of place and the local way-finding landmark would be changed irrevocably.

- 3 Effect on character and local landscape appearance extremely important to local residents, especially those on Doverdale Park.

Unique character, like other park home sites, single storey timber homes of Doverdale Park, built on similar footprint of WW2 Prisoner of War Camp (listed by English Heritage, 2003). Its historic integrity should be preserved and respected, without urban housing infiltrating into its surroundings. Some original retained roadways, layout of grid pattern, allowing clear aspects to park boundaries.

Proposed development of modern homes, varied elevations, different construction materials and style. Not compatible with existing residences on Doverdale Park, considered to be a rural settlement, and older large residences on The Forest, homes bordering the A442 and Forest End.

Proposed site currently pasture, surrounded by rural setting of woodland, hedgerows, Doverdale Park, The Forest, Grade 1 listed church, homes on A442 and Forest End.

Pasture and open space would be significantly reduced, impacting on landscape character and appearance.

- 4 Benefits of providing homes, including affordable ones. Could result in ongoing potential displacement and/or negative impact on quality of life for elderly residents, who may resort to an already pressured care system, reducing housing gains.

Benefits of providing work during construction phase but not clear whether local labour force would be used nor time period of employment.

Provision of environmental features - nest and bat boxes, wild flowers, grasses, increased water area, tree and hedge-planting, while beneficial in principle, would not increase or maintain current wildlife levels, but would disturb and decrease it during a construction phase with no guarantee of sufficient restoration during subsequent occupation. Trees and hedges would provide some screening but time to establish to satisfactory level would require many years, 1-15 years estimated in the report, reducing effectiveness. Maintenance, irrigation, and management vital.

Benefit of being close to amenity of Public Rights of Way, Bridlepath, Monarch’s Way, but would be unwelcome visibility of urban style development, interrupting the current open aspect along the site from those routes and St Mary’s listed church, churchyard, The Forest, Doverdale Park, A442, Forest End, railway line, dual carriageway of A442 south of Stonebridge Cross. Bridlepath from site through

tunnel under railway line leads along PRow uphill to a steep pasture. Some roof lines of Doverdale Park are visible from that height among the trees but new development of higher elevations would intrude very much into that panorama, even more so in winter.

- 5 Planning obligations do not fully address impacts of development.

Transport/Travel

Regular personal walking experience in both directions along A442, to access local countryside, sometimes crossing the highway, gives good insight into traffic circulation and behaviour, other pedestrians and cyclists.

Addition of pedestrian refuges, 1.2 m wide, along A442 would not necessarily provide safer crossings. Speeding traffic in both directions, well in excess of 40mph limit even up to 50mph or more, including HGV's, does not inspire confidence in using those crossings, for anyone, able-bodied or infirm.

Contributions to local bus services would still be insufficient to provide a sustainable mode of public transport for school attendance and working hours, night shifts, or evening travel.

Walking distances for schoolchildren not realistic in view of highway conditions, 40mph limit often exceeded, exposure to weather conditions, at all times of year, footpaths limited to one side of the highway, so repeated crossing is required with limited visibility at certain times of year, safety issues on narrow footpath along A442 for all pedestrians.

Not many local residents walk along the A442 because of its inherent dangers, noise, vehicle fumes, distance from small local stores or larger facilities at Droitwich, and age/mobility limits. Car is the preferred option, followed by local limited bus service for non-car owners, plus local taxis where affordable. Same issues would be faced by new residents.

Hedgerow along A442 cut once a year, in autumn, illegal to cut during bird-nesting time. More overgrown since walking audit conducted in July 2022, narrowing walking space for pedestrians. Single-file walking only option at all times of year. High traffic noise levels do not allow conversation between walkers which could be an issue for parents and children walking together.

A442 also used by tractors hauling large machinery, cyclists as individuals and in groups, in addition to several types of delivery vehicles, especially Amazon vans and HGVs. Behaviour of some HGV drivers varies between driving towards the middle of the road to give a wider berth for pedestrians on narrow footpath, or staying close to the footpath, some slowing down, others maintaining high speeds regardless of passing elderly pedestrians, or straddling the middle line to overtake cyclists. Potentially serious situations if refuge islands are positioned along that fast straighter stretch of road. Ghost islands are regularly used for overtaking by speeding motorists, even when vehicles are indicating to turn right into a junction.

HGVs exiting Doverdale Lane onto the southbound A442 sometimes encroach onto pedestrian space along the narrow footpath, close to new proposed access road.

4 junctions already exist along this busy stretch of A442, addition of 5th to provide new access route for proposed development would add to danger levels and potential risks for all users, especially in view of actual traffic speed.

Flood Risk

“NPPF - PLANNING AND FLOOD RISK

162. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.”

“164. The application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. To pass the exception test it should be demonstrated that:

- a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
- b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

165. Both elements of the exception test should be satisfied for development to be allocated or permitted.”

The development would not provide wider sustainability benefits. Without the development, flood risk would not be increased except through natural causes. Neither would the development be safe for its lifetime, nor reduce overall risk, but add to it in spite of mitigation measures.

Elevated land (59m above sea level at Turrett House), encompassing northern radius area from proposed site, creating natural drainage flow of surface water from homes, surrounding land and A442, towards the new access point, through proposed site, and eventually Elmbridge Brook.

Regular flooding at Doverdale Lane junction (41m above sea level, and former site of pool, evident for many years on OS maps, prior to junction alteration) down A442 in a diagonal flow, sometimes joined by overflow through hedgerow of accumulated floodwater from proposed site field north of Doverdale Park boundary.

Winter of 2019-20, A442 remained flooded for several weeks, from Doverdale Lane to the entrance of Doverdale Park (42m above sea level). Road Closed signs placed on the road, but larger vehicles mounted footpath to travel through, sending out large plumes of water. Flooded area would have included where new access road is proposed. Standing shallower water produces icy areas in cold weather.

Likewise, any flooding across Doverdale Park entrance would affect our access.

Winter rainfall early 2022, during a drier winter than normal, did produce flooding on the field for a few weeks, and some at Doverdale Lane Junction.

While SuDS and Retention Basin, if flow well-directed, could help alleviate surface water drainage on proposed site, hard surface areas will be greatly increased, compared with current absorbency and area of pastureland. Retention Basin being located away from flood plain to lessen disturbance of silt etc in high rainfall event will not prevent lower area from flooding, if Elmbridge Brook overflows - a potential occurrence due to debris being washed down from upstream. If it combines with Retention Basin becoming overtopped, the new foot/cycle route could become flooded, further flood risk would ensue downstream towards A442 and Westlands Estate, which has flooded previously. Any debris/fallen trees in Elmbridge Brook near the site, also occurred previously, would exacerbate the situation. Record high temperatures and this year's drought do not signify no further high rainfall events.

Wildlife

Wildlife observed by residents, on the proposed site and/or in gardens on Doverdale Park includes, but is not exclusive to those listed below. Many species will be affected by construction and settlement phases. Some residents observe night-time activity via wildlife cameras.

Mammals

Hedgehogs - in decline in the UK, but present in gardens on the park and the proposed site, in addition to:

Foxes	Roe deer
Rabbits	Muntjac
Rats	Grey squirrels
Mice	

Birds

- some of which are placed on the RSPB Birds of Conservation Concern List 5

Other birds are frequently sighted according to season, but those listed below are more endangered:

RSPB Red List :-	RSBP Amber List :-
Linnet	Wood pigeon
Swift	Sparrowhawk
Willow tit	Wren
House Martin	Song thrush
Mistle thrush	Redwing
Fieldfare	Dunnock
Greenfinch	
Redpoll	
Starling	

Great numbers of fieldfares (Red List) and redwings (Amber List) feed on the grass pasture during winter months, before migrating to their breeding grounds in Scandinavia or northern Scotland, after feeding on fields, and/or hedgerows. They

forage steadily across the field but are easily disturbed, even by passing trains. Very few breed in the UK. Starlings, also on the Red List, often accompany flocks of fieldfares and redwings on the field. The feeding ground would be greatly reduced by the proposed development, and the remainder disrupted by human activity resulting in the likely loss of those birds to the site.

The site is a huge feeding ground for several types and large numbers of birds. Insects and invertebrates feed from decomposing sheep faeces, nectar, seeds, wild vegetation, fungi on trees and grassland, enhanced by dead and decaying wood which provide habitats and valuable food sources for a range of wildlife. The whole environment forms part of a well-developed co-existing eco-system that has evolved over centuries on previously undeveloped land. Some are protected species while others are quite common. In combination, they are all part of the hierarchy and cycle of life, whether common or rare. It is a genuine wildlife corridor, enhanced by the woodland, browsed by sheep, fed by Elmbridge Brook, gardens on Doverdale Park, many encouraging wildlife, and the quiet living environment.

The addition of a construction phase, new settlement and an inevitably more noisy environment, greater movement of traffic, more pollution and people on new roadways, pedestrian and cycle paths will increase disturbance to wildlife. While it is acknowledged that wildlife improvements have been proposed, the potential loss of some sensitive or endangered species is not welcome. Preservation of what exists is preferable to replacement. That which has evolved naturally should take precedence. The proposed housing development will fragment the current wildlife area, disconnecting the eco-system into smaller parcels of land with greater human intrusion. The likelihood is that many species, including migratory ones, will not return. The same applies for bat species, which do not necessarily use bat boxes, especially if there are suitable trees, possibly outside the proposed site, which might result in alternative feeding and roosting grounds being sought.

While special lighting has been recommended to preserve the presence of bats, it is extremely likely that new residents will install their own lighting to gardens and dwelling exteriors, potentially negating light measures to protect bats. In addition, night-time noise from social activities, especially outdoors, will add another disruption factor for all wildlife.

The proposed installation of a natural play area, close to woodland on the eastern edge of the site could also be disruptive to wildlife. It coincides with the area where roe deer, muntjac, rabbits, foxes etc emerge from the woodland and railway embankment. Much of the bird population makes constant use of those trees. The sensitive species will leave to find less disturbed natural spaces. That also applies to open areas, currently foraging grounds, close to proposed walking and cycling routes, if they are used frequently.

Sightings of many species will have limited numbers being reported to local wildlife organisations in view of the proposed site having no public access at present. That includes lack of documented evidence of bird sightings for the same reason. Surveys conducted in recent years in connection with the Planning Application have provided snapshots in time, but sightings of seasonal and migratory species, combined with varied locations of monitoring equipment would not necessarily highlight a more complete wildlife scenario. Sightings of wood pigeons were mentioned, but not that they have now moved from the Green List to Amber.

[gov.uk](https://www.gov.uk) Protected species and development: advice for local planning authorities published a table of “When to survey”¹. It can be seen that bat surveys could have been more complete, by surveying during different months, in view of all bat species being protected by Law. They move to and from different sites according to whether they are breeding, nursing, swarming or hibernating, so a more comprehensive study would have produced a fuller picture of their habits and habitats. Table 2 also covers survey times for other protected wildlife. Notably 2 surveys, even though using recommended methodology, searching for water voles in November, being conducted at a time when they are less active, would have been better carried out from spring into summer to be more certain of their presence/absence.

Bird life does not appear to have been monitored specifically to assess different seasons, for example, winter behaviour patterns show no evidence of being surveyed. Official bird sightings are noted in locations away from the site, but unless local residents have the expertise to recognise and report sightings, then with no public access to the field, there will be no documented wildlife. That does not signify that it does not exist.

Photographs submitted 3 March 2022 as Neighbour Response 08a.to W/22/00201/OUT show long-tail tit, sparrowhawk, pheasants, fieldfares and redwings. The fieldfare and redwing photo is not clear but was taken from indoors to avoid disturbance.

In addition, grazing by sheep generally occurs between mid-late April until January. The non-grazing months allow uninterrupted growth of flora and fauna, but no surveys were done in those months, a period of increasing wildlife activity which has remained unobserved in any surveys and none were done from November to January. Sheep generally only eat nettles and thistles when cut down, enabling the plants to grow tall in the meantime, providing forage and breeding grounds for birds, butterflies, moths and insects. While the surveys acknowledged that different seasons have different species, important winter visitors or migratory species are missing from the surveys, including those birds on Red and Amber Lists above. Local residents, on Doverdale Park and The Forest witness much more wildlife, including mammals, on a regular basis than what has been documented. Those 8 years since the field was first considered for development would have given sufficient time to conduct more comprehensive wildlife surveys.

Much of nearby agricultural land consists of huge arable fields, use of chemicals, very little organic matter added, little evidence of wildlife to the same degree and large-scale removal of hedgerows and margins, (compared with OS maps of 1980s, 1990s and even 2010). Preservation of remaining natural areas, foraging grassland, hedgerows and margins are essential and the continuity of eco-systems adjacent to the Significant Gap. There is no physical barrier separating the Gap and the field. They are contiguous, thereby having continuity of use, which should be preserved.

The proposed site has been considered as fairly low quality agricultural land. However, grazing land should not be regarded as insignificant. It comprises part of the food chain, now even more important to retain, as the war in Ukraine has

¹ [gov.uk](https://www.gov.uk) Protected species and development: advice for local planning authorities. When to survey. Table 2. Survey timetable

highlighted the UK's need to be more self-sufficient in terms of food supply and food security.

Prior to sheep grazing on the field, which began approximately 10 years ago, the proposed site was allowed to grow wild, except for an annual cut of vegetation by a local farmer, in order to reduce the fire risk to Doverdale Park. Fencing on the field has not always been maintained by the landowner, resulting in sheep escaping more than once onto the local highway in recent years. Fencing was repaired in the last 2 weeks before the current Appeal start date.

6 **Planning balance**

- Outside Development Boundary for Droitwich
- Reviewed SWDP, phased plans up to 2041, recently published and due for imminent Public Consultation
- Core strategy of high sustainability throughout Wychavon
- 13,000 plus new homes, new towns, re-development of brownfield sites, new infrastructure, centred around existing and planned railway hubs and road networks
- Plan removes Hampton Lovett, and most Category 4 villages, from development areas in favour of more sustainable urban and higher category villages, easier access and availability of amenities and networks

- Heritage assets still remain and will always retain importance to all local residents, who are very proud of the history
- Pastureland in front of the Grade 1 listed Church of St Mary - ideal setting and preferred option, as it has been viewed for centuries. Sense of place, permanence, history, understanding its significance, connections to other local historic buildings and people
- Small peaceful churchyard, frequented by bereaved families and would not be enhanced by more traffic movement, increased human activity and noise in the vicinity
- Hampton Lovett Parish Rooms would not accommodate residents of proposed site, capacity of 120 people, which can easily be filled by existing residents
- Only facilities are St Mary's Church and Parish Rooms, totally insufficient to provide facilities for number of new occupiers of the site

- No infrastructure near proposed site, reducing chance of minimising travel, which conflicts with SWDPR and Government policy towards better sustainability
- Road traffic, conditions, limited bus service and distance from amenities not favourable to promote walking/cycling rather than car travel
- Surveys conducted for the SWDPR show the public's preferred walking distances to amenities and facilities are much less in time and distance than those needed between the proposed site and Droitwich, even with the new path/cycle route
- Sufficient educational capacity not readily available in Droitwich, nor at Cutnall Green. Travel difficulties as explained above, and no footpath to Cutnall Green along A442.
- Insufficient medical services available in Droitwich. Difficult to speak to GP surgeries at present, let alone have phone or personal consultations, even for those with medical conditions. No NHS hospital available in the town, and for non-car users, 3 buses would be necessary to travel to only NHS hospital on offer, located near Worcester. Services would be stretched even more due to developments progressing within the town.
- No pubs, restaurants, shops near the site, no evening bus service, making car/taxi travel the only option

- Disruption to existing well-established wildlife, including birds on Red and Amber Lists, bats, all of which protected by Law, fragmentation and disconnection of open space environment and wildlife corridors.
- Recreation spaces planned within the site would entail removal or disturbance of current wildlife.
- Incompatibility with character and setting of existing residences.
- Urban type of new dwellings, materials, design, varied elevation heights, layout incompatible with compact, grid pattern of self-contained Doverdale Park

SWDPR 05 states:

“Good design facilitates and contributes to local distinctiveness, as sense of place and pride in the local environment. It improves and enhances existing places and helps to attract people, businesses and inward investment. The quality of architecture and design are both relevant to the impact that development will have on the character of the area. High quality development requires a comprehensive understanding of the context within which it is located. It is very important, both environmentally and economically that new development continues to enhance the distinctive character of the built and natural environment.”

The proposed development would not integrate with or contribute to character of existing dwelling types on Doverdale Park and The Forest, which have their individual rural style. Park homes almost always located in rural areas and have become accepted as such.

NATIONAL PLANNING POLICY FRAMEWORK updated July 2021

“Rural housing

78. In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.”

“12. Achieving well-designed places”

“130. Planning policies should ensure that developments:

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);”

“ f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”

“132. Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective

engagement with the community should be looked on more favourably than those that cannot.”

To summarise the balance, losses would not be outweighed by the proposed gains.

UNITED NATIONS HUMAN RIGHTS Laws for the Elderly

Article 8 of Human Rights Act 1998 (amended)

“... everyone has right to respect for his private and family life. A public authority cannot interfere with the exercise of this right except where it is in accordance with the law and is necessary (amongst other reasons) for the protection of the rights and freedoms of others. Article 1 of Protocol 1 of the Act entitles every natural and legal person to the peaceful enjoyment of his possessions”.

Article 18 Duty of State

“It is the duty of the entire society to protect the lawful rights and interests of the elderly. Neighbourhood committees, villagers’ communities and the organisations of the elderly established according to law shall make known the demands of the elderly, safeguard their lawful rights and interests and serve them.”

CARE ACT - CARE AND SUPPORT STATUTORY GUIDANCE updated 2 September 2022

“Although the wellbeing principle applies specifically when the local authority performs an activity or task, or makes a decision, in relation to a person, the principle should also be considered by the local authority when it undertakes broader, strategic functions, such as planning, which are not in relation to one individual. As such, wellbeing should be seen as the common theme around which care and support is built at local and national level.”

“1.14 c) The importance of preventing or delaying the development of needs for care and support and the importance of reducing needs that already exist. At every interaction with a person, a local authority should consider whether or how the person’s needs could be reduced or other needs could be delayed from arising. Effective interventions at the right time can stop needs from escalating, and help people maintain their independence for longer (see chapter 2 on prevention).”

Independent living

“1.18 Although not mentioned specifically in the way that wellbeing is defined, the concept of ‘independent living’ is a core part of the wellbeing principle. Section 1 of the Care Act includes matters such as individual’s control of their day-to-day life, suitability of living accommodation, contribution to society - and crucially, requires local authorities to consider each person’s views, wishes, feelings and beliefs.”

“1.19 The wellbeing principle is intended to cover the key components of independent living, as expressed in the UN Convention on the [Rights of People with Disabilities](#) (in particular, Article 19 of the Convention). Supporting people to live as independently as possible, for as long as possible, is a guiding principle of the Care Act.”

PARK HOME LIVING

General background - in order to inform the Inquiry of the value of park home living and its provision of housing for the elderly.

Research below conducted in 2021²:

Identified more than 1,830 residential park home sites in England

More than 100,400 separate park home residential addresses

Estimates of approximately 159,000 park home residents who responded to survey.

(Actual figures may be higher due to lack of response from some park home residents).

- Non-standard housing sector, many sites evolved from holiday parks
- Valuable niche housing market, generally not featured in local plans
- Provides viable alternative housing options for the elderly
- Sites generally age-restricted, meeting specialist needs for older generation
- Must be only main residence
- Park home sites usually located in rural or out-of-town settlements, in locations where standard-built houses not usually permitted
- Selling point of homes is retirement dream in tranquil, peaceful setting
- Downsizing element in order to finance retirement and purchase park homes
- Release of family homes into standard housing market for younger generations
- Park home living maintains independent living for the elderly for longer time
- Community living with like-minded people
- Tranquil environment benefits resulting in lesser/less needs for medical and care system
- Most homes purchased along with the right to station them on a park, paying a pitch fee
- Long waiting lists on some parks to purchase homes
- Strict fire regulations for safety of all - no naked flames outdoors
- Adherence to park rules of right to live in and maintain a peaceful environment for all
- Choice of lifestyle, away from young families and commuting/working population
- Final home for many people
- Resultant financial constraints hinder/impede return to standard housing market

Construction

- Eco-friendly pre-fabricated construction of one storey homes by specialist companies
- Variety in shape and style
- Timber frame, floors and insulated walls
- Wheeled steel chassis base, usually surrounded by brick-built skirt after site installation
- Pitched roof of coated textured metal, pre-formed into tile effect
- Most homes double-glazed and centrally heated
- Older homes more easily re-furnished than standard brick-built homes
- Newer homes built to high specification, usually fully furnished but more expensive
- Maximum size limit to remain within classification type of being mobile
- Separation standards between homes to provide privacy and fire-break distance
- No rights of permitted development to extend homes, therefore size remains as built, unlike many brick-built homes
- Interior level access to all rooms
- Easier to adapt for mobility issues than brick-built homes
- Ramps/lifts can facilitate easy access

² Research conducted by University of Liverpool with Sheffield Hallam University for Department for Levelling Up, Housing and Communities from February-November 2021

Park Home Magazine: "Buying a park home is a fantastic way to plan ahead."

All population estimates for future years forecast a large increase in people aged 65 or over, which will be a major driving factor in housing provision. Park home living is an important option considered by many who wish to downsize and have homes to sell, but is not necessarily a well-known option among the general population.

DOVERDALE PARK HOMES

General background

- Current park population approximately 150, aged 55-100, many in their 80s and 90s
- Vulnerable sector of society, some frail and living alone
- No official body to protect or safeguard security and future of residents
- Impact on health and mental welfare of residents who are aware of planning issues
- Limited internet access by elderly residents
- Limited ability/faculties to respond to planning applications and appeals
- No deliveries of newspapers to park, due to distance from Droitwich, reducing knowledge of local issues
- Only access to local newspapers via internet or purchased/free copies in retail outlets

Outcome of the above is that some residents have limited access, comprehension or facility to comprehend documentation or to submit objections in the required manner. Onus falls on those able to respond and the responsibility is enormous. In order to restore better health and mental wellbeing for all, it is essential for residents to return to a peaceful lifestyle without continued or renewed trauma of opposing adjacent building developments. A construction process would include lengthy major disruption in terms of noise and air pollution, curtailing many outdoor activities on the park, and potential nuisance factor indoors, even more disturbing for those who need constant/regular nursing care.

• Life on Doverdale Park

- Detached homes, single or double pre-fabricated units located on level site
- Each home surrounded by well-tended garden on 4 sides
- Two open green spaces, several trees and shrubs
- Peaceful setting and lifestyle
- Visual amenity of countryside from homes, gardens and internal roads
- Interest and quiet observance of wildlife
- Pastoral setting of Grade 1 listed church
- Internal park paths and roadways used by more active residents for daily walks/exercise
- Community identity and sense of place
- Vibrant, active, legally registered and qualifying Residents' Association
- Social and fund-raising events, interactions within park and other residents of Hampton Lovett, including parish rooms and Church

Past opinions have considered a new development would enhance and enliven our community. That is not the case. We can interact with younger generations when we choose, but living permanently alongside a noisy construction site and subsequent settlement of mixed population would be totally detrimental to our peaceful quality of life. None of us want that outcome because we chose to live away from the urban environment. If the situation became intolerable enough for us to try and sell our homes, that could present difficulties, become protracted or maybe impossible. There are not many options available to us other than the care system. There is insufficient capacity to

take large numbers of elderly people in the local area. Many are too frail to move house, have nowhere to go and insufficient finances to buy into standard housing. As has been said before, approving a large planning application next to a park home site could set a precedent, especially in the current post-Covid explosion of widespread planning consent being applied for and granted, in an attempt to fulfil the specified quotas or find delays/shortfalls in local housing provision. Given the above numbers of people estimated to live in park/mobile homes, nationwide, and the accompanying numbers of previous homes released into the standard housing market, then it is easy to see how the situation could escalate and the saleability of park homes in general would decline. Bad news travels quickly. Once that fear exists that homes could become engulfed by housing estates, then the park home market would suffer. There would be no point in buying a park home if housing developments are approved in their immediate vicinity. That would also have a stagnating effect in areas of the general housing market, where homes are not released on the same scale as before. Impact on housing and care for the elderly would be greatly increased, without that niche market availability, which currently releases pressure on housing/care and medical services, specifically for the elderly.

As an example, in Worcestershire itself:

- 17 park home sites, approximately, of varying sizes
- 950+ homes, approximately
- 1,500 residents, approximately, based on 1 or 2 person occupancy

Those numbers and consequences need to be fully considered before developments are allowed to become the norm adjacent to park home sites.

To date there has only been one interaction between local residents and the developers, at Hampton Lovett Parish Rooms, which took place around the time previous application was submitted, with a start date of 7 Aug 2017. It consisted of displaying plotted outline plans, and no formal presentation. Attending residents indicated that plans were not accurate, omitting homes from Doverdale Park, the most outstanding being one on the north-east corner of Doverdale Park, which would be bordered on 2 sides by the proposed dwellings. The occupier at the time was present at the meeting, a disabled wheelchair user, justifiably indignant that her home had not even figured on the plan. A raised deck around her home allowed her total access via wheelchair. Sadly she died unexpectedly while the application was being processed. Current occupiers of that home will face the same intrusion on their privacy. Current plotted plans, even the most recent ones, updated a few weeks ago, by DJD Architects, for their client, Beechcroft Land Ltd, still present that same omission plus a couple of other homes not shown, in spite of several comments over the years. Plans have also shown buildings on the former Windrush area of Doverdale Park, which have not existed during the period of both Planning Applications. Those omissions and inaccuracies do not help engage the community. The only accurate map included to date is the Google-derived one, provided by the Environmental Dimension Partnership, overlaid with development features.

SOUTH WORCESTERSHIRE DEVELOPMENT PLAN REVIEW 2022

The report has now been published online and due to be discussed at a meeting on 13 October 2022, followed by Public Consultation from 1 November - 13 December 2022.

Key objectives include:

“To allocate most development in locations where there is good access to local services and where transport choice is maximised.”

“minimise need to travel”

“Protect and safeguard existing green spaces”

“Minimise the impact on and from all sources of flood risk”

Others state:

- Broader housing offer necessary for the elderly across SWDP area
- Population increase forecast across all ages, especially the elderly
- Need for “communities that are safe and feel safe”
- Focus to reduce older people’s long-term support in care homes
- Inclusion of enablement and independent living for longer
- Need for family homes to be released to the housing market
- New homes need to be accessible and others adaptable
- Desire of some older people to remain in own homes as long as possible, with adaptations/care
- Others aspire to live in bungalows or smaller houses
- Need for family homes to be released to the housing market
- Value of natural space, even if no access
- Visual amenity, Green Infrastructure and biodiversity

The proposed site location remains outside the Development Boundary in the latest reviewed SWDP, as it was in the previous version of the plan.

The importance and power of a large and increasing population of elderly voters is recognised.

CONCLUSION

Local physical elements relevant to the proposed site have not changed since the previous Application was refused and subsequent Appeal dismissed. The Heritage asset of a Grade 1 listed church, with its historical features, remains. Doverdale Park and its elderly residents remain, surrounded by a grazed pasture, inherent long-established eco-system, mature trees, hedgerows and the Significant Gap, a buffer separating the rural park settlement from urban Droitwich.

However, in the last 3 years, far-reaching unprecedented events have affected daily life. The prolonged Brexit process, physical, psychological and economic impact of a world pandemic, including a higher than average death rate, shortages of materials and labour, war in Ukraine with subsequent food and energy network issues, an ongoing cost of living and fuel crisis, threat of impending power outages over the coming winter, increasing possibility of national economic problems and shortage of labour. The above will affect housing, building and supply industries, creating delays or unfinished projects, impact on budgets and investment from rising costs, transport issues, shortages of skills and possible demise of companies. Realistic contingency plans would be crucial, in view of the large number of building projects currently in progress on a local and national scale.

Since Covid, the Amazon distribution centre on Doverdale Lane has remained in that location, adding to traffic circulation and dangers at that junction, close new access road.

The SWDP review has set in motion large-scale plans for housing over the next 20 years, based on sustainability, mitigation incentives against climate change, all based around current and planned infrastructure, rail and road networks, in order to minimise travel and improve access to facilities. There appears to be more than adequate provision for projected housing needs over the plan period, both for Droitwich, Wychavon, and some provision for neighbouring Tewkesbury.

Independent living for the elderly, as recommended by the Government, for as long as possible must be maintained and supported. Please do not allow a precedent to be set for housing developments to be built adjacent to park home sites populated by the elderly. To date, there has been no evidence of our demographics and vulnerability being taken into consideration or even acknowledged throughout proposal plans and submitted reports. Therefore, we strongly request that our case against the planned development be fully heard and given more weight, in order to restore our health, sense of well-being and security. No-one would wish their elderly relatives to have their health and wellbeing compromised by impending developments in such close proximity. Our peaceful lives are more than significant and we no longer want to endure the continued harassment of planning applications and appeals. The psychological impact is enormous and felt by many. We have experienced security for a long time, in some cases 20-30 years, living without passers-by. That would change drastically, introducing loss of privacy, overlooking and a dominating presence of nearby houses. A fear of opportunist crime, would prevail, facilitated by a new foot/cycle route, giving easy and shorter access, especially from Westlands, which often experiences incidents requiring police presence, to areas around Doverdale Park. Not all garden boundaries are secure, which would allow entry throughout the park. Fire risk is also a serious concern, especially in periods of drought, and strong winds, quite often from northern and eastern directions, as experienced this summer, because there would be no control of that aspect within the new development.

Doverdale Park has a relatively small population, but one which will have and is experiencing a huge adverse affect from the proposed plan. We escaped the high death rate from Covid, due to our isolation from the general population, and our independent living, unlike many in care institutions. Our homes, gardens and open spaces are extremely important to our residents for our wellbeing, physical and mental health. We need empathy for our freedom and enjoyment of our environment.

Do we sell our homes? Can we sell? Do we reduce the price to improve saleability? What type of home can we afford? Where can we go? Do we have to move out of the area to find an affordable home? Do we go into the care system? An ongoing stressful dilemma. We do not wish to leave our homes nor the quality of life and independence we enjoy, but we do not want to live next to a building site or a housing estate with young families, increased traffic, elevated noise levels, passers-by, loss of security, loss of privacy, loss of tranquility and loss of local wildlife. We thought we had made the right choice of our final homes, to live quietly and maintain our independence for as long as possible.

Please restore our peace of mind, safe retirement and security for the future. Fighting planning applications is not the retirement we planned or envisaged. We are struggling to tolerate this long-standing distress. We plead for the Inquiry's careful consideration to remove the repeated worry and uncertainty for Doverdale Park, and consequently other park home sites. We ask the Inquiry to please allow our elderly residents to live out their lives in peace and security.