From: Janet Suffield

**Sent:** 25 July 2022 00:55

To: reviews

Subject: ELECTORAL REVIEW OF WYCHAVON

**Attachments:** boundary050722.pdf; A1-Droitwich-Spa-FINAL.pdf

**Categories:** Submissions,

# Dear Sirs

#### **FURTHER COLLECTIVE SUBMISSION**

### BY DOVERDALE PARK RESIDENTS' ASSOCIATION AND RESIDENTS

Re: Letter dated 29 June 2022 from Boundary Commission to Chief Executive, Wychavon District Council

The above-mentioned letter contained a link to the Boundary Commission's draft proposals. Concerns arose that our previous submissions do not appear to have been taken into account regarding our electoral equality, community identity and arrangements for effective and convenient local government. We acknowledge that the date has passed for submissions for the northern Wychavon District but the decision to strongly object to the proposals via this collective submission was discussed at our Residents' Association AGM on 22 July 2022. The vote was unanimous to proceed with this crucial plea for our voice to be heard.

Since the attached document was written, the maps included in the latest information for Wychavon area, now appear to show Wassage and Hampton Lovett Rural areas, but still raise questions and require clarification. There are no voters or residents in the industrial areas contained within the Wassage area. Where does Doverdale Park fit into the scheme? Do proposals still place us in Droitwich West?

We thank you in anticipation for your attention in this matter.

Yours sincerely

Mrs J Suffield Representing Residents of Doverdale Park Homes and Doverdale Park Residents' Association

## Holt, Nicole

From: Janet Suffield

**Sent:** 07 August 2022 15:33

**To:** reviews

**Subject:** ELECTORAL REVIEW OF WYCHAVON

**Categories:** Submissions, Simon

Dear Sir/Madam

Further to our Collective Submission sent 24 July 2022, we wish to add more comments.

The facts in this email are mostly taken from information in the public domain and were a response to Mr Allison's email to us dated 25 July 2022. We did forward our concerns to yourselves in the Collective Submission from Doverdale Park and Residents. The link sent in Mr Allison's email was to the southern area of Wychavon, not the northern area and no connection to Doverdale Park.

The submission dated 18 March 2022, from Mr Vic Allison, on behalf of Wychavon District Council to the Local Government Boundary Commission for England commented on various proposals within the Wychavon area. As a Consultee, Wychavon District Council appears able to submit opinions regarding the proposals. Minutes published of the full Council's meeting on 23 February 2022, stated that a "cross party group had met to discuss proposals and some consensus had been agreed". Any decision about Doverdale Park was not mentioned within the submission from Mr Allison to the Boundary Commission containing the Council's views on draft proposals. There was a comment on one area where a community would have been split by the draft proposals. If that consideration can be given to some communities, then what is the reason for Doverdale Park being treated differently? If the draft proposals were to be adopted, a totally split and isolated community would be the outcome. Our residents' welfare needs respect and safeguarding.

From responses submitted in February, March and July 2022, it is obvious that the majority of local people and officials objected rather than agreed to the Boundary Commission's proposals. Both Labour and Conservative responses were against the proposals, setting out reasons. Likewise, Hampton Lovett parish council (2 submissions), Doverdale Park Residents' Association, and individual residents, plus our recent Collective Submission all strongly objected to the proposals. Among the few agreements with local proposals, are the Liberal Democrats and one Lib-Dem Droitwich town councillor. That councillor holding a seat in the current Droitwich West ward, wrote a very brief agreement with the proposals without stating any reasons, but in the recent past has voiced many criticisms of fellow councillors on social media. Droitwich Town Council is Conservative led and has only 2 Liberal Democrat councillors.

Paragraph 52 of the Boundary Commission's report encouraged more information from Doverdale Park residents to state their community identity. That has been done several times. We have responded to the Commission's considerations of electoral equality, examining electoral numbers, suggesting boundaries, describing our sense of community and effective administration. We have described our demographics, our close links with Hampton Lovett and desire to remain with current boundaries. No-one seems to be listening. To date there has been no real acknowledgement of our concerns, no answers to questions posed and no change to proposals. As we believe local government strives to be transparent, is this transparency or even democracy?

As stated in our previous document, 4 other park home sites near Droitwich have retained their rural status, but not Doverdale Park. Again, why? To date, there has been no response to that question. If we were to be placed in Ombersley along with the rest of Hampton Lovett, with whom we have forged good relationships, we would have something in common with our good neighbours and at least 3 other park home sites. Our needs would be better understood and catered for by the relevant parish council, rather than the urban housing estates of Droitwich West, with which we have no commonality in age range, house style, life style, infrastructure, or crime rate. Park home

sites are normally located outside town boundaries and their appeal to buyers is a peaceful life, in what, for many residents, is planned for or becomes, their final home, in a rural setting.

Therefore, Doverdale Park strongly opposes the proposed boundary change to Droitwich town. We wish to remain part of Hampton Lovett, retain our rural status, like other park home sites, and appeal for compassion and the highest consideration possible to protect, support and safeguard our future peace and quality of life.

Yours faithfully

On 25 Jul 2022, at 09:20, Vic Allison < <u>Vic.Allison@wychavon.gov.uk</u>> wrote:

Dear Mrs Suffield

Thank you for your e mail and attachments which I have carefully read.

As I understand it, the latest proposals are for Doverdale Park to be included in an expanded Droitwich West Wychavon District Council ward. Please see link https://consultation.lgbce.org.uk/node/24728.

I can confirm that the District Council has not influenced this decision. The review of our warding patters is undertaken by the Local Government Boundary Commission for England and we are a consultee on their proposals.

I suggest you forward your concerns to the Local Government Boundary Commission for England.

Kind regards

Vic Allison Joint Chief Executive Malvern Hills and Wychavon District Councils

Tel:

Website: www.malvernhills.gov.uk or www.wychavon.gov.uk

## **ELECTORAL REVIEW OF WYCHAVON:**

# FURTHER COLLECTIVE SUBMISSION - BY DOVERDALE PARK RESIDENTS' ASSOCIATION AND RESIDENTS

Re: Letter dated 29 June 2022 from Boundary Commission to Wychavon District Council

The Boundary Commission's letter, dated 29 June 2022 to Wychavon District Council, contained links to draft proposals. Previous submissions by Hampton Lovett parish council, local councillors, Doverdale Park Residents' Association and individual residents, strongly opposed to the proposed changes, do not appear to have been taken into account. Draft proposals contained in the letter's link show no further change indicated for Doverdale Park from those outlined in January 2022, in spite of strong oppositions submitted after that date. The letter stated that sufficient information had been received for the northern area to formulate proposals, from which we can only infer that our views have not been accepted. The review states that all responses are considered important. We acknowledge the consultation period for the northern area of Wychavon district ended on 21 March 2022, but a further submission from Doverdale Park is now vital to explain our sense of identity and community, and that serious consideration will be given to maintain our inclusion within Hampton Lovett parish, and not Droitwich.

The Boundary Commission's "tour of Wychavon" and Doverdale Park area, in paragraph 50 aimed to consider potential links to the northern area of Droitwich but:

"received no evidence specifically referring to the community identity of this area, and whether it looks to Droitwich or to the remainder of Hampton Lovett parish for services and amenities."

Paragraphs 51 and 52 are also of concern:

- "51 Based on our observations on tour, we consider that it is likely that the Doverdale Park area shares at least some community links with the Droitwich area. Accordingly, we propose to place this area, together with the neighbouring employment areas around Wassage Way and Pointon Way, within a Droitwich-based ward. This improves the electoral equality of Droitwich West and ensures that the warding arrangements for Hampton Lovett parish remain viable.
- We would be particularly interested in further evidence from residents of Doverdale Park, as to whether our proposal is indeed an accurate reflection of their community identity."

The proposals are definitely not an "accurate reflection" of our "community identity". Have our previous submissions earlier in 2022 been taken fully into account?

"When carrying out an electoral review the Commission has three main considerations:

- Improving electoral equality by equalising the number of electors that each councillor represents.
- Ensuring that the recommendations reflect community identity.
- Providing arrangements that support effective and convenient local government."

## **IMPROVING ELECTORAL EQUALITY**

In response to the first consideration, figures and facts below were extracted from the Boundary Commission's draft recommendations and interactive maps. Electorate numbers refer to 2020 and estimates for 2027 in Wychavon wards and Wychavon Draft Proposals.

The following official criteria were stipulated to be observed within boundaries:

- within 10% of being equal
- average number of electors per councillor 2372 in 2020

- 2546 in 2027

- being within 10% signifies "good electoral quality"

## Current local wards:

NAME CURRENT WARDS	NUMBER OF COUNCILLORS	CURRENT ELECTORATE	VARIANCE FROM AVERAGE %	FORECAST ELECTORATE
Lovett & North Claines (includes Hampton Lovett)	2	5604		6347
Droitwich West	2	3817		3966
Droitwich East	2	4265	-10%	4712
Droitwich Central	1	1956		2035
Droitwich South West	2	3935	13%	4066
Ombersley	1	2041		2131
Bowbrook	1	2395	1%	2501
Dodderhill	1	2260		2398

# Wychavon Draft Proposals:

NAME DRAFT PROPOSALS	NUMBER OF COUNCILLORS	CURRENT ELECTORATE	VARIANCE FROM AVERAGE %	FORECAST ELECTORATE
Undefined (Droitwich West)	2	4506	-5%	4682
Droitwich South East	2	5066	7%	5337
Droitwich East	2	4265	-10%	4712
Droitwich South West	2	5368	13%	5547
Undefined (Ombersley)	1	2223	-6%	2319
Undefined (Hartlebury & Dodderhill)	2	5303	12%	5545
Undefined (North Claines & Salwarpe)	1	4592	-3%	5299

# **Electorate Propositions for Doverdale Park**

To remove Doverdale Park, Forest End and Hampton Lovett Industrial Estate from the proposed Droitwich West area. To add the 3 areas to the proposed Ombersley area.

Observing the criteria of 2372 electors in 2020 and 2546 in 2027, calculations made from the charts show the following for Wychavon Draft Proposals:

	2020		2027	
<b>Droitwich West</b>	4506	-5%	4682	
Minus D. Park	- <u>150</u>		- <u>150</u>	
	4356		4532	
2 councillors =	2178	each	2266	each
Criteria	2372		2546	
Difference	-194		- 280	
10% of 2372	237	10% of 2546	254	
	2020		2027	
Ombersley	2223	-6%	2319	
Add D. Park	+ <u>150</u>		+ <u>150</u>	
	2373		2469	
Criteria	2372		2546	
Difference	+ 1		- 77	
10% of 2372				

Removing 150 Doverdale Park voters from the proposed Droitwich West ward for the 2020 figures would still leave that electorate within the 10% range, having 194 voters less than the 10% variance figure of 237. For 2027, the removal of Doverdale Park's 150 voters would mean that voters would be 280 below the criteria going a little beyond the tolerance 10% figure of 254. However, there is more potential among several housing estates throughout Droitwich West with a greater age range and working populations for natural progression to increase voter numbers beyond the forecast, thereby retaining more chance of staying within or close to tolerance levels.

Examining figures for the proposed Ombersley ward, adding Doverdale Park's 150 voters for 2020 would add 1 voter above the criteria of 2372, making the difference negligible. Adding 150 to the figures for 2027, brings the total voters to 2469, 77 below the criteria of 2546, and well within the 10% variance threshold of 254. Adding Doverdale Park to Ombersley along with the rest of Hampton Lovett would actually improve electoral equality in that ward.

The park's approximately 150 voters would not fluctuate to any degree, even if we achieved a very unlikely two-person occupancy among 102 homes. Our numbers may even decrease periodically. Our desire is to remain included with the rest of Hampton Lovett parish as our location always has been. In the current ward, Doverdale Park's electorate comprises more than half of Hampton Lovett parish's voters but can be incorporated into the proposed Ombersley ward without surpassing the criteria.

The property at Forest End should also be included with Hampton Lovett, the 2 voting residents having many links to the parish community, with which they do identify. Their number would not duly affect the totals.

With regard to the employment areas to the west of Doverdale Park, around Wassage and Pointon Way, known as Hampton Lovett Industrial Estate, containing factories and

businesses, there are no residents or houses. Therefore no potential voters to affect the numbers. Hampton Lovett and Westwood parish council wish those business to remain in the parish in order to maintain good relationships in matters that affect our environment, especially roadside litter. If they were to be removed to Droitwich, the parish council would no longer have a voice or any control in those issues.

The revised Parish Electoral Arrangements for Hampton Lovett & Westwood Parish Council referred to in Paragraph 104 of the Draft Proposals report mentions 3 wards - Hampton Lovett Rural, Wassage and Westwood Parish, represented by 5 parish councillors. No explanation is offered to define the Wassage Ward, either by location or electorate numbers, but would have 2 councillors. It does not appear on the interactive maps. Does it refer to the area around Wassage Way? If so, the whole area contains only commercial premises. This ward needs clarification regarding boundary, electorate and rationale for number of councillors. Hampton Lovett Rural also needs definition to differentiate it from Hampton Lovett, if there is genuinely a difference. There is no transparency to assess the situation accurately, as well as some less than user-friendly aspects for the uninitiated of accessing review documentation.

# **Boundary Propositions for Doverdale Park**

To maintain the current boundary line between Droitwich town and Hampton Lovett, retaining Doverdale Park Homes, Forest End and Hampton Lovett Industrial Estate within the existing parish.

Doverdale Park currently lies within Hampton Lovett parish and the ward of Lovett and North Claines. Draft proposals would completely change those boundaries, with a large area being incorporated into Ombersley, including the northern part of what can only be presumed as the proposed Hampton Lovett "Rural". The new proposed Ombersley boundary line does not follow natural boundaries, but skirts around the garden perimeters of properties on both sides of the A442 and the junction with The Forest, creating an irregular profile. It does not conform to "strong, easily identifiable boundaries" as suggested as part of a good pattern of wards. It follows the southern edge of Doverdale Lane, including a property to the west of Farmbank Plantation, continuing southwards to include Westwood Park and circumventing Hampton Lovett Industrial Estate. Doverdale Park, Forest End and Hampton Lovett Industrial Estate would be excluded from the proposed new Ombersley area and be incorporated into the new Droitwich West. Significantly, that boundary would include the field around Doverdale Park where a Planning Application for development has been submitted.

In some places, no natural or constructed boundaries are apparent in the new proposed wards, as suggested for potential boundary limits. In fact, the proposed Ombersley boundary would encompass rural areas containing larger properties and farms with large landowners. The vast majority of farmlands would remain intact. Proposed changes would completely split our rural community. Logical explanations are not apparent. There is no obvious evidence that should prevent Doverdale Park from being included with the rest of Hampton Lovett, or remaining in our rural setting. All our residents made the deliberate choice of a rural lifestyle on buying our properties. The proposed changes suggest a means to separate the larger, higher-value properties from Doverdale Park, de-classify it from its rural status, and thereby facilitate potential development of the surrounding land.

There are at least 4 more park/mobile home sites near Droitwich, and many more throughout the county. Hanbury Wharf lies to the east of Droitwich, off the Hanbury Road, approximately 2 miles from Droitwich, very similar to the distance from Doverdale Park into Droitwich. It has retained its rural placement, now within the proposed Bowbrook ward. The following 3 parks, also in rural settings, are included in the proposed area of Ombersley. Dunhampton Park is on

Doverdale Lane, off the A449 between Kidderminster and Worcester. Mount Pleasant Mobile Home Park, is off Mount Pleasant Lane, near Comhampton. The Fruiterers Arms Park is north of Ombersley. In addition, Droitwich Marina, slightly less than 2 miles from the town, and which provides another alternative lifestyle, being residential narrow boats, retains its rural setting being placed in the proposed Inkberrow area. All of these residential sites are deliberately located in the countryside, an attractive selling point for thousands of people who choose to live or retire in peace and tranquility.

Doverdale Park would have far more affinity with other local park sites in the area, as well as our neighbouring villages than we would ever have with Droitwich town. We should retain our rural status in common with other park home sites. None of these communities are urban developments. Reasons to single out Doverdale Park with different treatment are concerning.

Local planning bodies have continually built outwards from Droitwich town, constructing large industrial estates since the 1960s. Prior to that, land surrounding the town was totally agricultural. Some industrial sites have been abandoned, one recently re-vamped as a DIY retail area, but land near the railway station has been derelict for many years. A detrimental sight on approaching the town by rail. A Significant Gap near the northern end of the Berry Hill Industrial Estate was set up to form a buffer between the town and nearby settlements.

Quoting the SWDP2 Development Strategy & Settlement Hierarchy, Paragraph D:

"Development proposals should ensure retention of open character of the Significant Gaps shown on the Policies Map. The purpose of maintaining these gaps, which either serve as a buffer or visual break between rural settlements and adjacent urban areas or protect the character and settling of settlements, is to provide additional protection to open land that may be subject to development pressures. The designation helps to maintain a clear separation between smaller settlements and urban areas in order to retain their individual identity"

It is the only Significant Gap in Droitwich, and at the SWDP review in 2019, described as:

### "Droitwich Spa

An extensive tract of open land which separates the main built up area of Droitwich from Doverdale Residential Park and the industrial estates of Hampton Lovett and Stonebridge Cross"

No - not within a settlement.

"The River Salwarpe passes through it so some land is medium flood risk and some is high flood risk both of which are inappropriate for residential development."

[NB: Should be Elmbridge Brook, rather than River Salwarpe]

No - could not be reduced in extent and retain its purpose

Yes - visible from the A442

Yes - call for sites within

Part of the land is subject to a planning appeal

Locally significant in the context of Droitwich Spa. Nb The land is the subject of a formal planning appeal in October.

On balance retain to be consistent with the approach for Evesham"

The appeal, quoted in this document, dated October 2019, was dismissed in January 2020.

The field adjacent to Doverdale Park is the last field of open space between Droitwich and the countryside, and it should remain as such, with grazing sheep, providing a source of food production, plus its wildlife. Doverdale Park constitutes that smaller rural settlement which needs to retain its individual identity and character, not comparable to bricks and mortar dwellings. It is separated from nearby urban areas, the nearest being Westlands housing estate, Berry Hill Industrial Estate and the rest of Droitwich West.

If the current boundaries in question were to remain, the map would appear less manipulated, More natural and constructed boundaries would be evident. To include Doverdale Park, Forest End, and the industrial estate with "Hampton Lovett Rural" is not unreasonable. The proposed mapped boundaries show a greater intrusion of Droitwich West northwards, cutting into the proposed Ombersley area, resulting in Ombersley being located both east, north and west of Droitwich West. The eastern section lies to the east of the railway line, contrary to further south where the line has been proposed as the eastern boundary for Droitwich West. The latter would cover an area, well to the north of Droitwich town, extending southwards as far as the A38, Roman Way. To reduce that northwards protrusion, keeping the existing boundary line along Elmbridge Brook would be a more practical and less invasive solution, giving a more logical profile on the map, maintaining the Significant Gap as an open area separating Droitwich from Doverdale Park, Hampton Lovett and the industrial estates, as intended.

The current Droitwich town boundary lies to the south, following the natural boundary of Elmbridge Brook in a south-westerly direction, part of the present Droitwich West ward. It includes the urban settings of Westlands housing estate, further housing developments, retail parks, schools, leisure centre, playing fields and industrial estates. The proposed boundary changes would retain many of the above elements. Doverdale Park has absolutely no affinity or identity with any of these areas, apart from frequenting some retail outlets, as do neighbouring rural communities, where no alternatives exist. Doverdale Park has no views or outlook to any of those areas and therefore no sense of setting within those communities.

Actual natural and constructed boundaries define Doverdale Park's location and setting. To the south, pastureland, Elmbridge Brook, Milgrove Plantation and the Significant Gap separate us from the current Droitwich town boundary. To the east, north and south, lies pastureland bordered to the east by the Worcester/Birmingham railway line and to the north, The Forest. To the west, lies the A442 and Hampton Lovett Industrial Estate beyond. We are adamant that we wish to retain our current rural setting with its current boundaries, in common with other park home sites, such as those already included in Ombersley. It seems a very logical conclusion to include us in an area which accommodates similar alternative style homes, not built of bricks and mortar. Park homes would not be permitted in a town setting and there are none within Droitwich itself. Is there other pastureland in Droitwich? Are grazing sheep allowed in Droitwich? The park does have tarmac roads, limited street lighting and all utilities, but that does not constitute an urban settlement.

## **COMMUNITY IDENTITY**

Responding to the review's second consideration, Doverdale Park's demographics, not openly evident from a "tour" of the area, should describe the situation more clearly. A retirement park of permanent residents, who sold previous homes and invested life savings to buy homes on the park and spend their retirement in a peaceful rural setting. The park is not social housing. Our homes are individually privately-owned, located on privately-owned land for which residents pay a monthly fee. We also pay extra council tax for the privilege of living within a rural parish. Minimum age requirement is 55 and the oldest resident recently achieved 100 years. At present, 102 homes, with approximately 150 potential voters, a number which does not fluctuate to any great degree. Homes are single person or 2 people occupancy with zero birth rate. The crime rate is zero, unlike urban estates of Droitwich. The passing of residents results in homes being sold to new residents. Many current residents are aged in their 80s and 90s, some having lived here for 20 to 30 years. They have **chosen** to live in a peaceful rural setting, away from the town, young families and daily commuter life.

The same situation applies to similar park home sites throughout Great Britain, where thousands of older people reside away from urban environments, living independently, avoiding the care system for as long as possible or even altogether. Without this opportunity

to live independently for as long as possible, peacefully and with an enhanced quality of life, the result would be many additional thousands of senior citizens needing more medical care, sheltered housing and advanced care. Systems already under great strain would potentially become more over-burdened if greater numbers were to need their services. This independent alternative way of life for senior citizens must be protected and supported, leaving the care system more available to those who have no other option. Any encroachment of planning applications, facilitated by boundary changes, to affect such independent living could set a precedent for other park home sites and place one housing sector against another. This would contravene Government policy of supporting independent living and housing needs for the elderly, and which formed part of the Levelling Up White Paper.

Doverdale Park has a strong rapport and interaction with the Hampton Lovett community. The identity, social life and nucleus of Doverdale Park's residents are closely connected to the parish of Hampton Lovett and the rural facilities beyond, such as tea rooms, pubs, restaurants, farm shop etc.

We joined forces with residents of Hampton Lovett to oppose Planning Application Ref:17/01631/OUT, which was refused in June 2018. The subsequent Appeal, was dismissed in January 2020, and, currently a further Planning Application Ref: W/22/00201/OUT, to build housing on land adjacent to Doverdale Park was notified in February 2022.

A strong sense of community with Hampton Lovett parish rooms and church became even more apparent during recent Jubilee celebrations. The park's residents were invited, along with residents of neighbouring parishes to celebrations organised by church members and parish council. A great success and a full parish hall. As evidence, photos were published in the summer edition of the parish magazine "Four Square", published online.

Doverdale Park's own Jubilee celebrations, two days later, were severely affected by overnight storms but the parish hall was made available to us at very short notice, due to the good relationship we have with the local community. Another success and the room was filled to capacity by Doverdale Park residents, many more than would have attended an outdoor event. Without that opportunity, the park's celebrations would have been cancelled.

The Park's residents are regularly invited to events organised by Hampton Lovett church members and the parish council - Harvest Services and Suppers, Heritage days and celebrations etc. Events are notified and appear in the Park's regular newsletters. We have a strong Residents' Association at Doverdale Park and the parish hall is regularly hired out for AGMs, Christmas celebrations, meetings, general events etc. Without a community meeting area on the park, the parish hall is always hired for communal events, being the most convenient venue for our senior residents combined with adjacent parking facilities and ease of access for those less mobile. Those without transport or with mobility issues are given lifts by neighbours. Pre-Covid, the parish hall also hosted tea dances and exercise classes, attended by our residents.

Droitwich does not offer such a convenient location nor the tranquil experience of the Hampton Lovett area. The town is therefore not generally considered as a venue for social gatherings. The bus service to Droitwich is limited, non-existent in the evening, and a severely limited service operates to Kidderminster. The schedule is more suited to our senior community rather than a working population. The bus service does not link directly to the railway station, almost 2 miles away, but can be reached on the return leg 40 minutes later, or at even longer intervals during the day, on its route out of town. The alternatives are taxi, walking, or by car. Parking close to the station is limited and fees apply. Parking in Droitwich before 6pm is payable on car parks, and limited to 40 minutes for on-street parking, with little availability. Droitwich is not wholly accessible for the less mobile. Amenities in the near locality, out of town, prove eminently more suitable and practical.

Hampton Lovett Parish Council played a part in securing our bus service and more recently agreed to provide a speed awareness device to be installed near the park entrance. That may be in jeopardy if we become part of Droitwich or the housing development goes ahead.

The Highways Authority, via its Transport & Development Team, recently responded to the current Planning Application Ref: W/22/00201/OUT stating there was "no scope within Transport budgets to increase subsidies to augment either of our local bus services". The Kidderminster service is already at risk and a further bus would be needed to increase the Droitwich service, requiring a contribution of £360,000. Other issues regarding the road layouts raised problems and the Highways recommendation was a deferral of the application until further information is provided or acknowledged.

There is no provision for public transport direct to Worcester Hospital from Doverdale Park or Droitwich. It would necessitate 3 buses from the park or taxi currently costing £30 each way. Hospital parking is inadequate and expensive. No prospects are apparent for any improved bus service to the hospital, even if we were to be included within Droitwich.

One of our residents currently serves as a committee member of Hampton Lovett parish council. If we are removed to Droitwich, we would have no voice on the parish council nor influence in any local issues. One well-known park resident and well-respected committee member of the parish council, died very recently, in his 90s, having served on Hampton Lovett parish council for around 18 years, as Treasurer. His obituary was published in the latest parish magazine "Four Square", summer edition. Some of our deceased residents lie buried in Hampton Lovett churchyard and their survivors visit to pay their respects.

Hampton Lovett church, itself a listed building, is visible from many viewpoints within Doverdale Park, presenting its beautiful setting, nestled among mature trees and fronted by pastureland, rented by a local farmer on a grazing tenancy for sheep. Wildlife abounds. This is our environment. Doverdale Park bears no resemblance to an urban setting. Wide open areas, well-tended gardens and a well-maintained park are very evident, often praised by visitors. We have no views of Droitwich, located about 2 miles to the south. Nearby Industrial estates are well screened by trees. The style of our single storey detached timber homes are not compatible with an urban setting. An urban development would not fit with Doverdale Park or its rural surroundings.

The park is located on the site of what was a WW2 Prisoner of War Camp 1942-1948, listed by English Heritage in 2003 as "Longbridge, Camp 54", one of only 6 camps in Worcestershire. That history must be respected, retaining its integrity and significance.

Our residents do resort to Droitwich for medical, banking and some shopping facilities, but that is the same scenario for residents of neighbouring parishes in nearby rural locations. Without infrastructure to provide these amenities in such locations, all local communities have no option but to depend on nearby towns for certain amenities.

However, demographics also mean that many Doverdale Park residents do not have internet access or faculties to respond individually to boundary change proposals. After seeking consent from members, Doverdale Park Residents' Association wrote a submission earlier in 2022, on behalf of the majority of residents. A poll showed that of the Association's 86 member homes, 100% wished to stay with Hampton Lovett parish, giving consent to the Association to write a submission on their behalf. This was also to alleviate distress caused to many residents of another planning application appearing at the same time to build housing on the adjacent land. In January 2020 a Government Inspector had dismissed an Appeal, after refusal of the previous application. The land being outside of Droitwich town boundary has been one obstacle to development of the site. The boundary change, notified at the same time as the planning application was a double-pronged assault on our future after our short

respite from planning applications, and which had been marred by the stress of the pandemic. The consultation period to comment on the new planning application was short but those residents, who were able, submitted their comments individually on that application. The Residents' Association then duly made their submission to the Boundaries Commission on behalf of the members, encouraging individual submissions where possible. It may therefore appear that there were not many responses to the Commission, but members' opinions were unanimous. Draft proposals in a link contained in the above-mentioned letter of 27 June 2022 to Wychavon District Council made no mention of any submissions regarding Doverdale Park, or of any deviation of the plan which includes us with Droitwich. Our opinions stated in previous submissions are still valid but now we strongly appeal to make our collective voice heard in order to preserve our identity and strong sense of community.

## **EFFECTIVE AND CONVENIENT LOCAL GOVERNMENT**

In reply to the third consideration of a review body:

A boundary change would suggest a change of polling station for Doverdale Park. Currently, we vote at Hampton Lovett parish rooms, convenient for our residents for reasons already outlined. Any change of voting venue could restrict our residents' ability to vote. Many would not travel further afield than Hampton Lovett parish rooms, a venue that has been used for decades. That change would not be a just or fair outcome of the proposals to level up constituencies. Our residents should maintain their ease and convenience of access to voting, as well as other amenities, taking their age and mobility into consideration. They should also be voting for candidates representing the area where they reside, not for those who represent Droitwich West which has nothing in common with the park and not part of our community.

The needs and services required for the two communities of urban areas in Droitwich West and senior citizens in Doverdale Park would not be compatible or easily administered. Different age groups, lifestyle, working families and children have little in common with the quiet peaceful life of our elderly citizens. There appears very little spare capacity for elderly care in the town, should our residents become unable to tolerate a building development and its subsequent occupancy. Given the Park's distance from Droitwich, with little prospect of improved public transport or provision of additional services, it is difficult to envisage how or if we would gain any benefit from being part of the town. We have no infrastructure near the park, apart from Hampton Lovett Church and Parish Rooms, which are regularly part of our lives and visible from the Park.

The National Planning Policy Framework recognises a "diverse range of needs". "The health and lifestyles of older people will differ greatly, as will their housing needs".

The Government's Guidance for provision of housing for older people:

"Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking".

Paragraph: 001 Reference ID: 63-002-20190626

Revision date: 26 June 2019"

The Levelling Up White Paper and its task force "is in line with wider trends to provide more choices for older people that sit between care 'at home' and moving to a care home. A letter signed by politicians and campaigners called for the 2020's to be the "decade of housing with care", declaring:

"The urgent need to expand the sector has been illuminated by the COVID-19 pandemic, during which Integrated Retirement Communities have kept residents shielded, healthy, and socially connected. Evidence has shown for a long time that Integrated Retirement Communities improve the health and wellbeing of residents - taking pressure off GP surgeries, hospitals and care homes, and freeing up homes for all ages."

While not an official Integrated Retirement Community, similar effects are experienced by residents of Doverdale Park - a sense of community, a peaceful quality of life, a high rate of longevity, socially connected to each other, plus people and places in the neighbouring countryside. This chosen lifestyle and type of residence must be protected to maintain independent living for the elderly as long as possible, without the intervention of boundary changes allowing adjoining urbanisation to take place.

## REQUESTS FOR DOVERDALE PARK

### **Electorate**

The addition of Doverdale Park and Forest End, along with the rest of "Hampton Lovett Rural" to Ombersley electorate would not surpass the prescribed criteria for equality of electorate per councillor. Stated to be at minus 6%, the addition of all current Hampton Lovett to the new Ombersley area would mean that Variance from Average % would remain well within tolerances and improve electoral equality.

## **Hampton Lovett Boundary**

The fervent wish to remain within the current boundary, Doverdale Park, Forest End and Hampton Lovett Industrial Estate to be part of Hampton Lovett and to be included within the new proposed Ombersley area, or wherever the parish is eventually placed.

Rather than levelling up and providing more equality, the proposed boundary changes would make Doverdale Park more isolated, both from Hampton Lovett as well as Droitwich, without any prospect of improved or adequate services.

There is no apparent reason why Doverdale Park cannot remain within a rural ward, as at least 4 other park home sites near Droitwich have retained that status. We deserve the right to equal treatment.

### **Questions:**

- Is there an ulterior motive to boundary change proposals?
- Is there a reason why Doverdale Park is being treated differently to other park home sites in the Droitwich area?
- Is our potential inclusion within Droitwich town boundary a means to remove a major obstacle to local planning applications?
- Is the review planning ahead for additional potential voters, should the current development project be approved?
- Is someone with local knowledge responsible for suggesting the boundary change proposals?
- Is the Economic Development Needs Assessment of July 2019 still valid for consideration in connection with planning developments?
- Is the Strategic Housing & Employment Land Availability Assessment of October 2019 involved in current proposals and future development?

The last two questions arose, firstly from an Economic Development Needs Assessment requesting Call for Sites from local landowners offering land for potential employment use. Two local parcels of land, both Greenfield sites, were offered to the north of industrial areas in Droitwich Spa. One field adjoining and directly north of The Forest, lies between the railway line and eastern edge of the A442. The second field is on the western side of the A442, surrounding a property named The Turrets House on three sides. Both fields were offered for employment use as "industrial, warehousing" and considered "logical areas for expansion of employment uses if required." They were recommended for employment use.

The second question results from the Strategic Housing & Employment Land Availability Assessment where land availability was charted. The above 2 parcels of land, CfS0501 and CfS0502 were listed as suitable for development for employment use. Most of the questions posed in the chart, such as impact on historical, archaeological, agricultural and locality factors contained no responses. However, there was confirmation of the wish to be included in SHELAA and being carried forward for potential allocation in the South Worcestershire Development Plan Review. The sites were deemed suitable for development.

Both sites would be highly visible from the Grade 1 listed building of Hampton Lovett Church, and its graveyard, not to mention by all surrounding residents. Agricultural land would be lost and the whole aspect of that rural area would be destroyed. Impact on local residents would be immense.

At the time of requesting the Call for Sites, in June 2018, one Planning Application to build adjacent to Doverdale Park was refused, and sites offered were charted in July 2019. When the SHELAA assessment was charted, in October 2019, the Planning Application had just gone to Appeal, and was dismissed in January 2020. No doubt, that if the Appeal had been successful, the likely outcome would have been applications to industrialise those two Greenfield sites and the potential for coalescing neighbouring developments.

## **Conclusions for Doverdale Park**

While Planning Applications are not part of the Electoral Review process, they appear intrinsically linked in this case. If Droitwich town boundary is extended to include Doverdale Park, it could enable the current Planning Application to be approved. That may advance any plans to develop further industrial areas to the north, as outlined above. This is industrialisation taken to extremes and most of the current industrial units employ people from a very wide area, not just Droitwich. Income generated for the town becomes reduced. Industrial units in the locality have been providing employment for workers from a very wide area, for decades, and to the detriment of its own landscape in the process. Instead, we experience more vehicles, including HGVs, more pollution and the steady destruction of an environment that had always been primarily agricultural. It cannot continue indefinitely.

Doverdale Park retirement community is part of a beautiful, peaceful, rural landscape. A small green oasis. Wildlife is enjoyed by all. Our senior citizens have an overwhelming desire to live in peace and tranquility as their choice of lifestyle. It would be an absolute travesty and an injustice to include us with Droitwich town and urban settings. It would divide our tightly-knit community of Hampton Lovett parish. We earnestly request the Boundary Commission and Wychavon District Council to respect our wishes in order to support our independent living, preserve the open space and wildlife, complying with Government Policy and the Levelling Up White Paper.

