

Regulation 16 Consultation on the Submitted Hallow Neighbourhood Plan RESPONSE FORM

Under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012, Hallow Parish Council has submitted the draft Hallow Neighbourhood Plan to Malvern Hills District Council. In accordance with Regulation 16, Malvern Hills District Council would like to invite comments from organisations and individuals on the Neighbourhood Plan.

This consultation runs for six weeks from Friday 15th January to 5:00pm on Friday 26th February 2021.

If you wish to comment on the draft Hallow Neighbourhood Plan **please complete and return this form no later than 5:00 pm on Friday, 26th February 2021 to:**

Email: policy.plans@malvern hills.gov.uk , or by

Post: Planning Policy, Malvern Hills District Council, Planning Services, The Council House, Avenue Road, Malvern, Worcestershire, WR14 3AF.

The personal information you provide on this form will be held and processed in accordance with the requirements of the Data Protection Act 2018 and the General Data Protection Regulation 2018.

Please note that your name and comments will be made publicly available when displaying the outcome of this consultation and cannot be treated as confidential. Any other details, including signatures, private telephone numbers and email addresses will not be published on the Council's website, but the original representations with personal details redacted will be published. Your details will be retained in order for us to validate your comments. We will use these details to notify you of the progress on the Hallow Neighbourhood Plan. If you do not wish to be notified of the progress of the Neighbourhood Plan please let us know by ticking the appropriate box at the end of this response form.

Please fill in your details in the boxes below:

Full Name: Mrs Kathryn Ventham

Organisation (if applicable): Barton Willmore

Address (including postcode): 9th Floor, Bank House, 8 Cherry Street, Birmingham, B25AL

Telephone number: [REDACTED]

Email address: [REDACTED]

Please state which part of the draft Neighbourhood Plan (i.e. which section, objective or policy) your representation refers to (please use a separate form for each representation):

Policy HAL1, Policy HAL2, Policy HAL7, Policy HAL8

Please use the space below to make comments on this part of the Neighbourhood Plan.

Please see accompanying representation report submitted 26.02.21.

Please use a separate form for each representation.

Future Notification

Please state whether you would like to be notified of the decision on the Neighbourhood Plan proposal:

Yes

No

Signature K. Ventham

Date 26.02.21

Thank you for completing this form.

Planning Policy at Malvern Hills District Council
Planning Services
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Avenue Road
Malvern
Worcestershire
WR14 3AF

VIA EMAIL: policy.plans@malvern hills.gov.uk

31066/A3/HM/GJ/KV

26th February 2021

Dear Sir / Madam,

**REPRESENTATIONS TO THE DRAFT HALLOW NEIGHBOURHOOD PLAN (POST-SUBMISSION
STAGE REGULATION 16 CONSULTATION)**

LAND WEST OF THE A443, HALLOW HEATH – IM LAND LIMITED

Introduction

Thank you for the opportunity to respond to the Post-Submission stage (Regulation 16) consultation of the Draft Hallow Neighbourhood Plan (HNP). We write on behalf of IM Land who are working with landowners at Land west of the A443, Hallow (the 'Site'). A Location Plan is provided at **Appendix 1**. This response should be read alongside our earlier Regulation 14 representations, submitted by Barton Willmore in August 2020.

The Site is located on the northern edge of Hallow and is approximately 4.78ha in size. It is greenfield land, currently in agricultural use. A Concept Masterplan has been prepared which illustrates how the Site could be developed. This is included within a supporting Vision Document which is attached at **Appendix 2**. The Site has previously been submitted for consideration in the preparation of the South Worcestershire Development Plan Review (SWDPR), which is currently at Preferred Options stage, as well as to the previous Regulation 14 consultation on the Hallow Neighbourhood Plan. It is considered that Land west of the A443 is a sustainable site which could assist in meeting the housing needs of the Neighbourhood Plan area to 2041.

The Hallow Neighbourhood Plan will need to demonstrate it has met the 'Basic Conditions' as set out in Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (alongside procedural compliance matters). In order to meet the Basic Conditions, the Neighbourhood Plan must:

- 8(2)(a): Have regard to national policies and advice contained in guidance issued by the Secretary of State;
- 8(2)(d): Contribute to the achievement of sustainable development;
- 8(2)(e): Be in general conformity with the strategic policies of the development plan for the area (in this case, the South Worcestershire Development Plan (SWDP)(2016) and the SWDPR);
- 8(2)(f): Be compatible with and not breach retained European Union (EU) obligations; and
- 8(2)(g): Meet prescribed conditions and comply with prescribed matters (namely the plan not breaching the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017).

Our representations are submitted with these Basic Conditions in mind. We set out our response to the Neighbourhood Plan consultation in policy order below.

In summary, we support the principle of the preparation of a Neighbourhood Plan for Hallow. However, we consider that the Draft Neighbourhood Plan breaches the basic conditions, and the following policies should be amended through deletion or targeted redrafting prior to being sent to referendum.

- Policy HAL1 – New Housing Development in Hallow Village 2021-2041;
- Policy HAL7 – Important Views; and
- Policy HAL8 – Green Infrastructure.

Policy HAL1 – New Housing Development in Hallow Village 2021-2041

Draft Policy Wording and Supporting Text

Draft Policy HAL1 allocates a single site in Hallow at Green Hill Lane for the development of a minimum of 40 dwellings and provides a number of criteria any development of the site will need to consider.

The Draft HNP states that this policy supports the existing strategic planning policy SWDP Policy 2 Development Strategy and Settlement Hierarchy. This policy ensures that new development is concentrated in the most urban areas and the larger villages, and that open countryside is safeguarded and where possible enhanced.

Paragraph 6.6 of the supporting text to Draft Policy HA11 goes on to state that:

"The allocation of the Green Hill Lane site will enable the HNPP to meet any identified housing requirement for Hallow over the period 2021 to 2041 that will be set in the SWDPR."

Relevant National Planning Policy and Guidance

As set out above, a draft neighbourhood plan policy must have correct regard to national planning policy and guidance (basic condition 8(2)(a)), must promote the achievement of sustainable development (basic condition 8(2)(d) and it must be in general conformity with the adopted strategic policies of the development plan in force for the area (basic condition 8(2)(e)). This supporting text proceeds on the basis of a misinterpretation of NPPF 65 and 66 and the applicable supporting paragraphs of the PPG.

Under NPPF 65 the "identified housing requirement" in a development plan document must be contained in "adopted strategic policies". It is only once that document has been submitted for examination, examined, found sound and then adopted that it can be confirmed that these strategic policies have "set out a housing requirement for designated neighbourhood areas which reflects the

overall strategy for the pattern and scale of development and any relevant allocations". NPPF 66 provides an alternative route for a neighbourhood plan body to request a requirement figure, but this must "take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority."

National Planning Policy Guidance (Paragraph 009 Reference ID: 41-009-20190509) advises that where an indicative figure has been provided this "will need to be tested at the neighbourhood plan examination. Neighbourhood plans should consider providing indicative delivery timetables and allocating reserve sites to ensure that emerging evidence of housing need is addressed and that policies in the neighbourhood plan are not overridden by a new local plan."

PPG (Paragraph: 102 Reference ID: 41-102-20190509) provides further guidance, making clear that this can be a "similar process to that for providing a housing requirement figure. [LPAs] can use the authority's local housing need as a starting point, taking into consideration relevant policies such as an existing or emerging spatial strategy, alongside the characteristics of the neighbourhood plan area. // Proactive engagement with neighbourhood plan-making bodies is important as part of this process, in order for them to understand how the figures are reached. This is important to avoid disagreements at neighbourhood plan or local plan examinations, and minimise the risk of neighbourhood plan figures being superseded when new strategic policies are adopted."

Under PPG Paragraph: 105 Reference ID: 41-105-20190509, neighbourhood bodies can only determine their own indicative housing figure in exceptional circumstances, where the LPA is genuinely unable to provide the figure – and in doing so they must "tak[e] account of relevant policies, the existing and emerging spatial strategy, and characteristics of the neighbourhood area." (see also PPG Paragraph: 097 Reference ID: 41-097-20190509)

The Emerging Development Plan and Indicative Housing Requirement

The SWDPR is still at the very early stages of development, with the latest SWDPR timetable (updated 6 October 2020) indicating that an Additional Preferred Options (Focused on Sustainability Appraisal) Consultation will be undertaken in March-April 2021. As such, this statement is considered to be premature as it will be some considerable time before the housing requirement for the Malvern Hills District, and indeed the settlement of Hallow, is adopted for the purposes of NPPF 65.

The SWDPR Preferred Options document does not specify housing need in Hallow, and therefore cannot meet the requirements of NPPF 65 (even if it was adopted). Draft Policy SWDPR1 identified a housing requirement for the South Worcestershire Authorities of at least 13,957 dwellings over the Plan Period. Draft Policy SWDPR2 identifies Hallow as a Category 1 settlement. Category 1 settlements will be expected to deliver between 5 and 80 dwellings across the Plan Period. Draft SWDPR Policy 55 goes on to outline a preferred allocation at Land Lying South of Tinkers Coppice Farm for 49 dwellings.

The September 2019 Village Facilities and Rural Transport Study Report ranks Hallow 6th out of 11 Category 1 settlements in Malvern Hills District. Hallow is also located within close proximity of Worcester City Centre, where there are a large range of services and facilities (particularly when Worcester has historically been unable to accommodate its own growth and has looked to Malvern Hills and Wychavon DC to assist in meeting its housing need). Therefore, Hallow is considered to be one of the most sustainable and therefore suitable settlements within the District to accommodate growth, where the delivery of additional new development would assist in achieving sustainable development in line with basic condition 8(2)(d).

Given the above, there is currently no adopted development plan strategic policy which can meet the requirements of NPPF 65 and PPG 41-009. It cannot be stated that the proposed allocation at Green Hill Lane will meet the housing need for Hallow set out in the SWDPR when the SWPDR is at such an

early stage with additional work to be done to understand how the housing requirement will be distributed amongst the Category 1 settlements (of which Hallow is one).

The neighbourhood plan can therefore only proceed on the basis that the indicative housing requirement is one that must be tested at examination: NPPF 66 and PPG 41-009.

The supporting text to Draft Policy HAL1 sets out the housing need for Hallow. Over the period to 2041, a need for 22 dwellings is identified, broken down to 1 dwelling over the period 2021-2030 and 21 dwellings for the period 2031-2041. Paragraph 6.8 states that this figure has been identified through a methodology prepared by planning officers for the South Worcestershire Joint Advisory Panel – Indicative Housing Requirements for Hallow Neighbourhood Area 2021-2030 and 2031-2041.

However, when calculating the Indicative Housing Requirement 2031-2041 this methodology is flawed. It identifies that the SWDPR will need to make provision for 13,550 additional dwellings in the period 2031-2041 (a figure which is also included in the Draft Neighbourhood Plan) and it is clear that the population is an ageing one. The Indicative Housing Requirement 2031-2041 has not been the subject of consultation.

However, the Preferred Options SWDPR identifies a need for 13,957 dwellings. This figure is then adjusted to take account of the latest Planning Strategy (within the Adopted SWDP) which is currently that 87% of the additional dwellings required in south Worcestershire would be distributed to the main urban areas (Worcester city and the towns of Droitwich Spa, Evesham, Malvern, Pershore, Tenbury Wells and Upton upon Severn), with the remaining 13% of the additional dwellings distributed amongst the rural parishes.

The indicative housing requirement for the neighbourhood area is then adjusted according to that areas proportion of the population of the rural areas based on the 2011 census (which in the case of Hallow is 1.2% based on a population of 1,219). Based on the SWDPR figure of 13,957 the housing requirement for the period 2031-2041 is calculated to be 22 dwellings. In total this would bring the total residual indicative housing requirement for the plan period of 2021 to 2041 of 23 dwellings rather than 22. Whilst only a small uplift, this does not take account of any revisions to housing needs which may emerge through the Plan review.

In addition, the methodology prepared by planning officers for the South Worcestershire Joint Advisory Panel contains several caveats, including that the figures provided by the panel are by definition "indicative" and could be subject to change or review for several reasons i.e. it is possible that the planning strategy will change in the process of revising the SWDPR and therefore the final proportion of new development being allocated to Neighbourhood Areas could change. This reflects the requirement for ongoing engagement under PPG 41-102, and the need to ensure that policies are not superseded by later plans.

Given the above and based on the relatively early stage of the SWDPR, the Draft Neighbourhood Plan must acknowledge that further housing may need to be allocated to ensure that the HNP does not promote less development than the SWDPR. This would be contrary to paragraph 29 of the National Planning Policy Framework (NPPF) as set out above and thus contrary to basic condition 8(2)(a) and (d).

PPG 41-009 makes clear that the response to such situations should be the allocation of reserve sites. IM Land would support such an approach of allocating reserve sites "to ensure that emerging evidence of housing need is addressed" and the "policies in the neighbourhood plan and not overridden by a new local plan". IM Land consider that the Site to the West of the A443 represents a suitable, sustainable and deliverable opportunity for either an additional allocation or a reserve site. As set out above, Hallow is considered to be one of the most sustainable and therefore suitable settlements within the District to accommodate growth, where the delivery of additional new development would assist in achieving sustainable development in line with basic condition 8(2)(d).

The wider Malvern Hills area, including Hallow also has an affordability issue, with median house prices in the area being consistently higher than the national average, as referred to within paragraph 6.21 of the Neighbourhood Plan and The Malvern Hills Strategic Housing Market Assessment 2019. The Site to the West of the A443 would therefore assist in providing a mixture of dwelling types and sizes to meet the needs of local people.

Examination of Housing Requirement

The indicative housing requirement will now need to be examined for the purposes of NPPF 66 and PPG 41-009. Both Councils must be transparent in respect of how the methodology was assembled and how additional information has been taken into account, if at all.

Modification Required

We are of the view that in order to ensure compliance with basic conditions 8(2)(a), 8(2)(d) and 8(2)(e), the Neighbourhood Plan needs to consider the allocation of additional land for housing, such as Land west of the A443, or, it needs to allocate reserve sites for housing to ensure that the plan will be compliant with future versions of the SWPR. As an absolute minimum, the HNP needs to acknowledge that there may be a need to allocate additional land for housing through the SWDPR. The merits of Land west of the A443 are considered in further detail later in these representations.

Policy HAL2 – Housing Need

Draft Policy Wording

Policy HAL2 sets out that proposals for five or more dwellings must provide a range of type, size and tenure of dwellings to meet local needs. In particular, the policy identifies a local need for the following types of dwellings:

- Affordable housing (particularly 1-bedroom social rented dwellings);
- Affordable and open market 1- and 2-bedroom dwellings;
- Bungalows of different tenures.

IM Land does not propose modifications to Draft Policy HAL2, however we wish to draw attention to the contribution towards meeting the objectives of this policy that the Site west of the A443 could have. A proposed average density of 30 dwellings per hectare will complement the existing built form of Hallow. The Site has the potential to provide a mix of market, shared ownership and affordable dwellings, incorporating a mix of dwelling type and size. This will help to increase the range and type of dwelling tenures, in accordance with identified local needs.

Policy HAL 4 – Landscape

Draft Policy Wording

Draft Policy HAL4 requires new development to be designed so that it protects or enhances the local landscape.

Modification Required

NPPF 170 sets out that planning policies and decisions should *contribute to* and *enhance* the natural and local environment. 170(b) continues on to say that they should recognise the “the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland”. It therefore allows for greater flexibility and scope for benefits to be

delivered, by recognising that it would not be appropriate for all landscape features to be safeguarded, where mitigation measures / wider benefits can be provided.

In order to comply with basic condition 8(2)(a) and (d) we consider that the wording of this policy should be amended to align with the wording of NPPF 170 and 170(b), so as not to restrict otherwise sustainable development in the area in accordance with national planning policy.

Notwithstanding the modifications proposed above, we are confident that the development of IM Land's site will lead to certain landscape improvements and will meet the various bullet points (a)-(d). This is demonstrated as part of the Vision Document prepared for the site.

Policy HAL 7 – Important Views

Draft Policy Wording

Draft Policy HAL7 seeks to protect key views and advises that development proposals must be sited so that they do not "substantially harm" these views. View 18 on the policies map is identified to the north of the Site.

Evidence Base

The supporting text for draft policy HAL7 advises that the views were identified from the Hallow Conservation Area and Management Plan (2009) and through the work of the Steering Group and a well-attended community walkabout. The policy has not been supported by any landscape assessment work undertaken by a qualified consultant, nor is there any evidence setting out the value of any of the identified views. The Guidance on Landscape and Visual Impact Assessment (GLVIA) (3rd edition), whilst applicable to LVIA of individual developments, illustrates how such a process must be structured and properly documented: see for example p84, [5.26]-[5.31] and Box 5.1: setting out a structured approach to landscape value and Chapter 6, Visual effects, pages 109, [6.19]-[6.20] on the identification of viewpoints, page 110-111, [6.24] on baseline information and pages 114, [6.37] value attached to views. Maps and photographs must be assembled in a manner which clearly illustrates the relevant viewpoint: pages 138-141, [8.9]-[8.16].

NPPF 31 states that "The preparation and review of all policies should be underpinned by relevant and up-to-date evidence." Planning Policy Guidance (PPG) further sets out that when preparing a neighbourhood plan, "*proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan*" (Paragraph 040 reference ID: 41-040-20160211). Landscape and visual effects are the subject of specialist evidence, as reflected in the hierarchy of landscape protections in NPPF 170a and b and 171.

In this regard, a 'well-attended community walkabout' is not considered to provide robust / suitable justification for designating important views. It can gather opinions, but is not an objective or structured exercise.

It is absolutely critical that the designation of important views is informed by a robust evidence base including detailed landscape assessments. The fact that a document is a neighbourhood plan does not lower the threshold of assessment to one where evidence is gathered in the unstructured manner described. Furthermore, the Hallow Conservation Area and Management Plan is outdated, having been adopted 12 years ago, directly contrary to NPPF 31 (cited above), which requires all policies to be underpinned by up-to-date evidence.

The description of View 18 in the Design Guide, which forms part of the Evidence Base for the draft Neighbourhood Plan, differs from the description in Table 8 in the draft Plan itself. View 18 in the Plan seems to better align with the description of View 21 in the Design Guide. As such, the value of

View 18 and the rationale for its protection is unclear. The NPPG states that a policy in a draft neighbourhood plan should be clear and unambiguous and should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications (Paragraph: 041 Reference ID: 41-041-20140306).

Modification Required

A more robust up-to-date evidence base should be provided in support of the designated views chosen for protection (e.g. a detailed landscape assessment carried out by a qualified consultant) in line with National Guidance and therefore basic condition 8(2)(a). Within the evidence base, the value of the views set out and the rationale for their protection should be clarified, particularly in relation to View 18.

Notwithstanding the above, it is worthy to note that View 18 is a sufficient distance to the north of the Site, and the proposed development boundary within the Site, including the proposed green space and landscaping, and will have little, if any, impact on View 18.

Policy HAL8 – Green Infrastructure

Draft Policy Wording

Draft Policy HAL8 seeks to maintain the Green Infrastructure (GI) identified on the Draft Neighbourhood Plan Policies Map (also shown at Map 13 of the plan). IM Land ***strongly object*** to the allocation of such a significant amount of GI, particularly on Land west of the A443. Its continued inclusion would be a clear breach of basic conditions 8(2)(a), (d) and (e).

Evidence Base

The NPPF Glossary defines Green Infrastructure as a "*network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.*" Under NPF 171 plans are required to "take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure". This strategic approach necessarily entails a robust and up-to-date evidence base, consistent with NPPF 31. Read consistently with NPPF 13, 18, 20, 28-30, a green infrastructure policy will ordinarily be a strategic matter covered in the development plan document. That allows it to ensure that it takes into account strategic development needs and does not constrain them. A neighbourhood plan that wishes to include a green infrastructure policy on a non-strategic basis, for the purposes of NPPF 28, is still subject to the requirements in respect of strategic policies. There is no lower threshold for neighbourhood plans, and none is described in the PPG.

The PPG explains that green infrastructure can embrace a range of spaces and assets that provide environmental and wider benefits e.g., parks, playing fields, other areas of open space etc. (Paragraph 004 Reference ID: 8-004-20190721). Strategic policies can identify the location of existing and proposed green infrastructure networks and set out appropriate policies for their protection and enhancement, but these must be evidence based and include assessments of the quality of current green infrastructure and any gaps in provision (Paragraph 007 Reference ID: 8-007-20190721). The same paragraph makes clear that this evidence base should take the form of a green infrastructure strategy prepared by the LPA, and it is plain from the context that this must be up-to-date, if it is to inform other plan policies.

In terms of evidence base, the supporting text to policy HAL8 (paragraph 7.26) sets out that the Green Infrastructure network has been identified based on the Worcestershire Green Infrastructure Strategy 2013-2018, where Hallow was recognised as an area where the approach to GI should focus on 'Protect and Invest', with the conclusion that it be an area for green infrastructure improvement. However, the Strategy is now time-expired. There does not appear to be any imminent review.

Based on the NPPF / PPG definition of Green Infrastructure, the reasoning and justification for designating so much GI on the northern and eastern edge of the built-up area of Hallow is unclear. There does not appear to be any evidence base to support the allocation of significant areas of GI on the edge of Hallow either as part of the SWDPR or the Neighbourhood Plan. It is unclear why certain areas of land are identified as GI and not others. Paragraph 7.24 of the Draft Neighbourhood Plan states that the GI will link various GI assets. However, the specific identified assets that are being linked by the proposed designation are not identified.

The Basic Conditions Statement (pages 2-3) says that it has been "based, in part on the Environmental Character Map referenced in SWDP Policy 5", which shows Hallow as being in a 'Protect and Enhance' environmental character area of Worcestershire Basing such a policy on a partial basis is not a robust evidence base, nor would it amount to general conformity with the strategic policy. It is then said "By mapping this resource the HNDP provides more detailed non-strategic guidance on GI. // Policy HAL8 also identifies local policy criteria for development that impacts on the neighbourhood area's GI. This approach is consistent with SWDP5." On the contrary, it simply reveals that the policy has not been conducted with proper regard to a strategic evidence base.

Further to this, within the Green Infrastructure Framework 2: Environmental Character Areas document, that the Environmental Character map is taken from, it is advised (page 7) that the boundaries shown on the map are intended to be soft edged and indicative, and do not define firm boundaries on the ground. As such "further county, district and local level green infrastructure work will be required to extract the local level of detail required for implementation at the district, local, neighbourhood and site scale." It is therefore clear that this map should not be used as the basis for a local level policy without any further, more detailed green infrastructure work being undertaken.

We have therefore proceeded on the basis that there is simply no evidence document that has been produced to support this policy. If the Neighbourhood Plan group have prepared such a document, then this should be published and the subject of further written consultation – as is a serious breach of Regulation 14 and 16 (tantamount to a fundamental flaw in the NPIERS guidance) to withhold a document of this kind which has informed the designation of a large area of land.

Given the lack of evidence base or explanation, the designation of such a large area of land identified as GI to the north and east of the built-up area of the village is a breach of the basic conditions. It is being used simply as a way of controlling development in otherwise relatively unconstrained locations. It will be recalled that in the context of Local Green Space, PPG 37-015 states that "blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name." This is a similar attempt to designate to restrict for its own sake, rather to protect an identified, existing use. NPPF 171 and PPG 8-007 together make clear that this approach is in breach of national planning policy and guidance.

In short, Policy HAL8 is considered to be a serious overreach from what GI was intended to deliver, breaching the basic conditions 8(2)(a) and 8(2)(d).

Modification Required

Based on the key attributes of GI set out in paragraph 7.24 of the plan, Land west of the A443 should be removed from the GI designation. This designation is not consistent with national planning policy and guidance. No sufficient justification / evidence has been provided for the designation of the GI network identified.

The deletion of Land West of A443 would not have any significant impact on the connectivity or integrity of the GI given that it is located on the edge of the GI designation. Alternatively, it would be possible to remove the southern part of the Site adjacent to the built-up area from the GI

designation to allow its potential development, as detailed in the Vision Document, but retaining the GI flow to the north.

Without prejudice to the submissions above, that this approach breaches the basic conditions, the development proposed in the Vision Document would still accord with (and not conflict with) the draft Policy's requirements, given its landscape-led nature, namely:

- Recreational, ecological, historic and landscape character functions of natural habitats;
- Drainage and ecological value of the network of watercourses and features; and
- The recreational function of existing footpaths, bridleways, public rights of way and publicly accessible green space.

Land West of the A443

IM Land submitted details of their land interest at Land west of the A443, Hallow to the SWDP Preferred Options consultation as well as to the Regulation 14 HNP consultation in 2020. A Location Plan is included at **Appendix 1**.

Under PPG Paragraph: 098 Reference ID: 41-098-20190509, a neighbourhood planning body which intends to allocate sites for development, must "carry out an appraisal of options and an assessment of individual sites against clearly identified criteria. // Guidance on general principles for assessing sites and on viability can provide the framework for the assessment of sites. The neighbourhood planning toolkit on site assessments may also be used." The guidance underlined is PPG Chapter 3 on Housing and Economic Land Availability. This requires a structured, transparent and objective assessment of suitability, availability and achievability (Paragraph: 017 Reference ID: 3-017-20190722)

PPG Paragraph: 018 Reference ID: 3-018-20190722 makes clear that "A site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated. // When considering constraints, plan-makers may wish to consider the information collected as part of the initial site survey, as well as other relevant information, such as: national policy;...potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation."

The Neighbourhood Plan Toolkit takes a similar approach. It makes clear on page 19 that sites must be "objectively assessed". Templates are provided. However, it is essential that constraints are properly assessed and that the exercise is undertaken in a robust manner.

The Site is considered to be a suitable, available, and achievable for development. This is demonstrated through the submitted Vision Document, which is included at **Appendix 2**. The Site is capable of delivering approximately 60 dwellings adjoining the built-up area of Hallow. As shown within the Vision Document, it allows for an appropriate green edge to the north of the Site, providing an appropriate transition from the built development to the open fields beyond, with proposed planting to filter views.

A smaller part of the Site is considered in the Site Options and Assessment Report by AECOM which forms part of the Evidence Base for the Draft Neighbourhood Plan. Overall, the Site is categorised as 'amber'. The AECOM Assessment for the part of the Site considered is as follows:

"Site is potentially suitable, available and achievable for development. The site boundary should be redrawn and reduced so that development would remain south of the hedgerow that runs east-west through the site, preventing development from being exposed and appearing intrusive within the rural landscape beyond the village with no screening vegetation. The site is greenfield and on Grade 2 agricultural land

adjacent to the settlement boundary. The site is only accessible through Heath Farm to the west, therefore a new access to the A443 to the east should be created. No indicative capacity has been identified by the landowner."

The proposed allocation site at Green Hill Lane was also identified as an 'amber' site within the AECOM Report. The site at Green Hill Lane was identified as potentially impacting the setting of three Grade II Listed Buildings, which Land west of the A443 does not. Within the Strategic Environmental Assessment and Habitats Regulation Assessment Screening Opinion, the Council's Archaeology and Planning Advisor advised that the site at Green Hill Lane shows evidence of wide ridge and furrow in LiDAR data. The medieval ridge and furrow is still evident,. As such, prior to the determination of any future development proposals a geophysical survey would be undertaken with any necessary mitigation agreed with County Archaeologist, subject to condition..

From reviewing Figure 1.3 of the AECOM Report, it is clear that the vast majority, if not all, of the land immediately adjoining the settlement boundary of Hallow is Grade 2 Agricultural Land (including the draft Neighbourhood Plan allocation at Greenhill Lane). Therefore, in terms of new housing provision for Hallow, there do not appear to be options to develop lower grade agricultural land adjacent to the settlement boundary. This cannot therefore be a reason to discount the Site at Land West of the A443 as a suitable site for development given this is applies to all land around Hallow.

On the basis of the above and the details contained within our Vision Document, there are no overriding constraints to the development of Land West of the A443. The Site is suitable, available and achievable for development. Conversely, the proposed allocation at Green Hill Lane has potential heritage and utilities constraints. As such, the Site west of the A443 should be considered as an alternative to the currently proposed allocation, or as an additional site to meet housing need as may be required by the SWDPR.

The Site has the potential to meet the policy requirements detailed in the Draft Neighbourhood Plan, namely HAL2 (Housing Need), HAL3 (Housing Design), HAL7 (Important Views), HAL9 (Biodiversity) and HAL15 (Sustainable Transport).

Summary and Next Steps

Whilst the principle of a Neighbourhood Plan for Hallow is supported, this version does not provide for future needs and inappropriately seeks to constrain growth. There is a need to allocate additional housing through the Neighbourhood Plan.

Under basic condition 8(2)(a), (d) and (e), as reflected in NPPF 13, 29, 37 and 65 and PPG 41-009, 044, 070 and 102, neighbourhood plans should not promote less development than that in both adopted and emerging strategic policies. The NPPF and PPG collectively require neighbourhood plans to have a robust evidence base if they seek to allocate land or restrict it.

Given the early stage of the SWDPR, as well as the Government's proposed changes to the standard methodology, there is a real possibility the housing requirement for Malvern Hills, and indeed Hallow, as identified in the current Preferred Options SWDPR will be greater than that within the Draft Neighbourhood Plan. As such, the Draft Neighbourhood Plan must consider allocating additional land for housing, reserved housing sites, or at the very least acknowledge the potential need further housing within the settlement to be allocated through the SWDPR.

As detailed above and in the Vision Document at **Appendix 2**, Land west of the A443 is a suitable, available and achievable Site which can assist in meeting Hallow's housing needs through a landscape-led proposal.

IM Land strongly object to the designation of GI at Land west of the A443. There is no justification or evidence base either as part of the SWDPR or the Neighbourhood Plan to support this designation.

Hearing

The Draft Neighbourhood Plan requires a significant number of modifications before it can proceed to referendum. In particular, policies HAL1, HAL7 and HAL7 require amending due to their failure to meet the basic conditions tests and have regard to national planning policy.

We therefore respectfully submit that this is a case which would merit a formal examination hearing, pursuant to Schedule 4B's paragraph 9(2)(a) to ensure adequate examination of the issue and to ensure that our client is able to have a fair chance to put its case to an Examiner. Such a hearing could be conducted by video conference procedures, such as MS Teams, in line with the Planning Inspectorate's practice with a number of Examinations in Public.

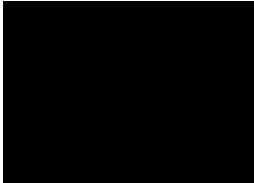
We trust that you will take these comments as helpful in progressing the Plan. Should you require any further information, or wish to discuss any points in further detail, please do not hesitate to contact me.

Yours sincerely



GEMMA JOHNSON
Associate Planner

Clerk to Hallow Parish Council



31066/A3/GJ/MAS/bc

7th August 2020

Dear Mrs Stark,

DRAFT HALLOW NEIGHBOURHOOD PLAN CONSULTATION

LAND WEST OF THE A443, HALLOW HEATH – IM LAND LIMITED

Introduction

Thank you for the opportunity to comment on the Draft Hallow Neighbourhood Plan. We write on behalf of IM Land Limited (IM Land) who are working with landowners at Land west of the A443, Hallow Heath (the 'Site'). A Location Plan is provided at **Appendix 1**.

The Site is located on the northern edge of Hallow Heath and is approximately 4.78ha in size. It is greenfield and currently in agricultural use. A Concept Masterplan has been prepared which illustrates how the Site could be developed. This is included within a supporting Vision Document which is attached at **Appendix 2**. The site has previously been submitted for consideration in the preparation of the South Worcestershire Development Plan Review (SWDPR), which is currently at Preferred Options stage.

In general, we support the principle of the preparation of a Draft Neighbourhood Plan for Hallow. However, given the strategy for growth outlined in the emerging South Worcestershire Development Plan Review (SWDPR), it is considered that further housing should be allocated in the Draft Neighbourhood Plan. Allocating sites in the Neighbourhood Plan gives the local area more control and management in terms of its future growth. It is considered that Land west of the A443 as a sustainable site to assist in meeting the housing needs of the local area to 2041.

Draft Hallow Neighbourhood Plan

The Draft Hallow Neighbourhood Plan seeks to guide development in Hallow during the period to 2041. It includes a single allocation for a minimum of 40 dwellings at Land at Green Hill Lane. It is accompanied by a Draft Policies Map which seeks to make a number of designations within the Neighbourhood Plan area.

We set out below our comments on policies pertinent to proposed development in Hallow generally, and specific to Land west of the A443.

Policy HAL1 – New Housing Development in Hallow Village 2021-2041

Draft Policy HAL1 allocates a single site in Hallow at Green Hill Lane for the development of a minimum of 40 dwellings. The principle of allocating land for housing development within the Neighbourhood Plan and the approach to allocating a minimum number of dwellings is supported.

Paragraph 6.6 of the supporting text to Draft Policy HAL1 states:

"The allocation of the Green Hill Lane site will enable the HNDP to meet any identified housing requirement for Hallow over the period 2021 to 2041 that will be set in the SWDPR."

This statement is considered to be premature. The SWDPR is still at a very early stage (Preferred Options), and delays to its progress were announced on 24th July 2020. As such, it may be some time before the housing requirement for Malvern Hills District is fully understood.

The SWDPR Preferred Options document does not specify housing need in Hallow. Draft Policy SWDPR1 identified a housing requirement for the South Worcestershire Authorities of at least 13,957 dwellings over the Plan Period. Draft Policy SWDPR2 identifies Hallow as a Category 1 settlement. Category 1 settlements will be expected to deliver between 5 and 80 dwellings across the Plan Period. Draft SWDPR Policy 55 goes on to outline a preferred allocation at Land Lying South of Tinkers Coppice Farm for 49 dwellings.

It is understood that the position has evolved since the publication of the SWDPR Preferred Options Report and that it may be necessary for additional sites to come forward to meet the identified housing need.

Given the above, it is not possible to categorically state that the proposed allocation at Green Hill Lane will meet the housing need for Hallow set out in the SWDPR when the SWDPR is at such an early stage with additional work to be done to understand how the housing requirement will be distributed amongst the Category 1 settlements (of which Hallow is one).

The supporting text to Draft Policy HAL1 sets out the housing need for Hallow. Over the period to 2041, a need for 22 dwellings is identified. This is based on a number of assumptions in respect of the SWDPR. The total number of dwellings for the Plan Period is identified in the Draft Neighbourhood Plan as 13,550 dwellings, however the Preferred Options SWDPR identifies a need for 13,957 dwellings. The Draft Neighbourhood Plan assumes that 13% of the overall housing need will be distributed amongst 'rural parishes'. It is unclear what is meant by 'rural parishes' given that Hallow is a Category 1 settlement. It is then assumed that the 13% will be distributed according to population distribution figures from 2011. It is unclear how the Draft Neighbourhood Plan concludes from this assumption that 22 dwellings will be required in Hallow over the period to 2041.

Paragraph 29 of the National Planning Policy Framework (NPPF) states:

"Neighbourhood Plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies".

Given the relatively early stage of the SWDPR, the Draft Neighbourhood Plan must acknowledge further housing may need to be allocated to ensure it does not promote less development than the SWDPR. Allocating further housing in the Draft Plan will allow Hallow to have control over the location of any future housing, rather than allocations being made at a District level.

The supporting text to Draft Policy HAL1 also states that a Housing Needs Survey was carried out to help inform the Neighbourhood Plan. The survey, although a helpful introduction to local views, cannot be relied upon alone

to determine housing need in Hallow in the absence of a confirmed wider need. We would also question its compliance with Objective 2 of the Draft Plan as it solely considers local residents rather than a combination of the needs of existing and future residents.

At a minimum of 40 dwellings, the proposed allocation falls significantly below the expected upper limit for development in Category 1 settlements of 80 dwellings as identified in the emerging SWDPR and also falls below the SWDPR Preferred Options site of at least 49 dwellings. The September 2019 Village Facilities and Rural Transport Study Report ranks Hallow 6th out of 11 Category 1 settlements in Malvern Hills District. Therefore, Hallow is considered to be one of the most sustainable settlements within the District and therefore a likely focus for new development. Its proximity to Worcester City Centre also reinforces its sustainability and suitability to accommodate additional development over the Plan Period to 2041.

The Neighbourhood Plan needs to consider the allocation of additional land for housing, such as Land west of the A443, or needs to acknowledge that there may be a need to allocate additional land for housing through the SWDP. The merits of Land west of the A443 is considered in further detail later in these representations.

Policy HAL2 – Housing Need

Draft Policy HAL2 sets out that proposals for five or more dwellings must provide a range of type, size and tenure of dwellings to meet local needs. In particular, the policy identifies local need for the following types of dwellings:

- Affordable housing (particularly 1 bedroom social rented dwellings)
- Affordable and open market 1 and 2 bedroom dwellings
- Bungalows of different tenures

The Site west of the A443 has the potential to assist the Neighbourhood Plan in meeting these types and tenures of dwellings. A proposed average density of 30 dwellings per hectare will complement the existing built form of Hallow. The Site has the potential to provide a mix of market, shared ownership and affordable dwellings, incorporating a mix of dwelling type and size. This will help to increase the range and type of dwelling tenures, in accordance with identified local needs.

Policy HAL 7 – Important Views

Draft Policy HAL7 seeks to protect key views and development proposals must be sited so that they do not harm these views.

View 18 is identified to the north of the Site. The description of View 18 in the Design Guide which forms part of the Evidence Base for the draft Neighbourhood Plan differs from the description in Table 8 in the draft Plan itself. As such, the value of View 18 and the rationale for its protection is unclear.

The Views identified in the draft Neighbourhood Plan have been informed by the Hallow Conservation Area and Management Strategy which is outdated, and from a community-led walk which, although useful in providing the views of local residents, is not a robust evidence base for allocating important views. Further justification is required to support the allocation and protection of these views, particularly View 18.

Notwithstanding the above, it is noted that View 18 is a sufficient distance to the north of the Site and development on the Site, including the proposed green space and landscaping, will have little impact, if any at all, on View 18.

Policy HAL8 – Green Infrastructure

Draft Policy HAL8 seeks to maintain the Green Infrastructure (GI) identified on the Draft Neighbourhood Plan Policies Map. IM Land **strongly object** to the allocation of such a significant amount of GI with no justification, particularly on Land west of the A443.

It is acknowledged that Hallow is included in Worcestershire GI's wider Environmental Character Areas, specifically in Teme Valley & Wyre Forest/Severn Valley North. However, the reasoning and justification for designating so much GI on the northern and eastern edge of the built-up area of Hallow is unclear. There does not appear to be any evidence base to support the allocation of significant areas of GI on the edge of Hallow either as part of the SWDPR or the Neighbourhood Plan. It is unclear why certain areas of land are identified as GI and not others.

Paragraph 7.24 of the Draft Neighbourhood Plan states that the GI will link various GI assets. However, the specific identified assets that are being linked by the proposed designation are not identified.

We are concerned that such a large area of land is being identified as GI to the north and east of the built-up area of the village simply as a way of controlling development in otherwise relatively unconstrained locations.

Removing Land west of the A443 from the GI designation would not have a significant impact on the flow of the GI given that it is located on the edge of the GI designation. Alternatively, it would be possible to remove the southern part of the Site adjacent to the built up area from the GI designation to allow its potential development, as detailed in the Vision Document, but retaining the GI flow to the north.

The landscape-led development proposed in the Vision Document would satisfy the draft Policy's requirements, namely:

- Recreational, ecological, historic and landscape character functions of natural habitats;
- Drainage and ecological value of the network of watercourses and features; and
- The recreational function of existing footpaths, bridleways, public rights of way and publicly accessible green space.

The Worcestershire Green Infrastructure Strategy (2013-2018) references the area in terms of green infrastructure. However, the Strategy is now time-expired and there does not appear to be an imminent review.

Land West of the A443

IM Land submitted details of their land interest at Land west of the A443, Hallow to the SWDP Preferred Options consultation. A Location Plan is included at **Appendix 1**.

The Site is considered to be a suitable, available, and achievable for development. This is demonstrated through the submitted Vision Document, which is included at **Appendix 2**. The Site is capable of delivering approximately 60 dwellings adjoining the built up area of Hallow. As shown within the Vision Document, it allows for an appropriate green edge to the north of the Site, providing an appropriate transition from the built development to the open fields beyond, with proposed planting to filter views.

A smaller part of the Site is considered in the Site Options and Assessment Report by AECOM which forms part of the Evidence Base for the Draft Neighbourhood Plan. Overall, the Site is categorised as 'amber'. The AECOM Assessment for the part of the Site considered is as follows:

"Site is potentially suitable, available and achievable for development. The site boundary should be redrawn and reduced so that development would remain south of the hedgerow that runs east-west through the site, preventing development from being exposed and appearing intrusive within the rural

landscape beyond the village with no screening vegetation. The site is greenfield and on Grade 2 agricultural land adjacent to the settlement boundary. The site is only accessible through Heath Farm to the west, therefore a new access to the A443 to the east should be created. No indicative capacity has been identified by the landowner."

It is noted that the proposed allocation site at Green Hill Lane was also identified as an 'amber' site within the AECOM Report. The site at Green Hill Lane was identified potentially impacting the setting of three Grade II Listed Buildings, which Land west of the A443 does not.

From reviewing Figure 1.3 of the AECOM Report, it is clear that the vast majority, if not all, of the land immediately adjoining the settlement boundary of Hallow is Grade II Agricultural Land (including the draft Neighbourhood Plan allocation at Greenhill Lane). Therefore, in terms of new housing provision for Hallow, there are no options to develop lower grade agricultural land adjacent to the settlement boundary. This cannot therefore be a reason to discount the Site at Land West of the A443 as a suitable site for development.

On the basis of the above and the details contained within our Vision Document, there are not considered to be any overriding constraints to the development of Land West of the A443. The Site is considered to be suitable, available and achievable for development. Conversely, the proposed allocation at Green Hill Lane has potential heritage constraints. As such, the Site west of the A443 should be considered as an alternative to the currently proposed allocation, or as an additional site to meet housing need as may be required by the SWDPR.

The Site has the potential to meet the policy requirements detailed in the Draft Neighbourhood Plan, namely HAL2 (Housing Need), HAL3 (Housing Design), HAL7 (Important Views), HAL9 (Biodiversity) and HAL15 (Sustainable Transport).

Summary and Next Steps

Whilst the principle of a Draft Neighbourhood Plan for Hallow is supported, we strongly believe that there is a need to allocate additional housing through the Neighbourhood Plan. The assessment of housing need has been based on a number of assumptions and it is unclear how the final figure has been arrived at. Furthermore, aspects of the evidence base, including the Housing Needs Survey, fail to consider the needs of future residents as set out in Objective 2 of the Draft Plan. It is acknowledged by the Draft Plan that any housing requirement is also a minimum. As such, it is considered that additional land should be identified for residential development to ensure that Hallow is truly meeting its housing requirements to 2041.

Given the relatively early stage and recent delay of the SWDPR, it is unclear how the Neighbourhood Plan can be confident it will meet the needs of the village for the SWDPR plan period. At the very least it must acknowledge there may be a need for further housing to be allocated through the SWDPR.

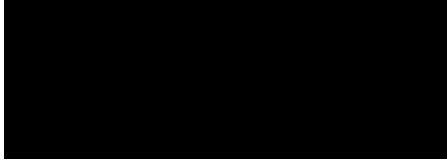
As detailed at Paragraph 29 of the NPPF, neighbourhood plans should not promote less development than strategic policies. Given the early stage of the SWDPR, there is a real possibility the housing requirement for Hallow identified in the SWDPR will be greater than that within the Draft Neighbourhood Plan. As such, the Draft Neighbourhood Plan must consider allocating, or at the very least acknowledge the potential need for further housing within the settlement to be allocated through the SWDPR.

As detailed above and in the Vision Document at **Appendix 2**, Land west of the A443 is a suitable, available and achievable Site which can assist in meeting Hallow's housing needs through a landscape-led proposal.

IM Land strongly object to the designation of GI at Land west of the A443. There is no evidence base either as part of the SWDPR or the Neighbourhood Plan to support this designation.

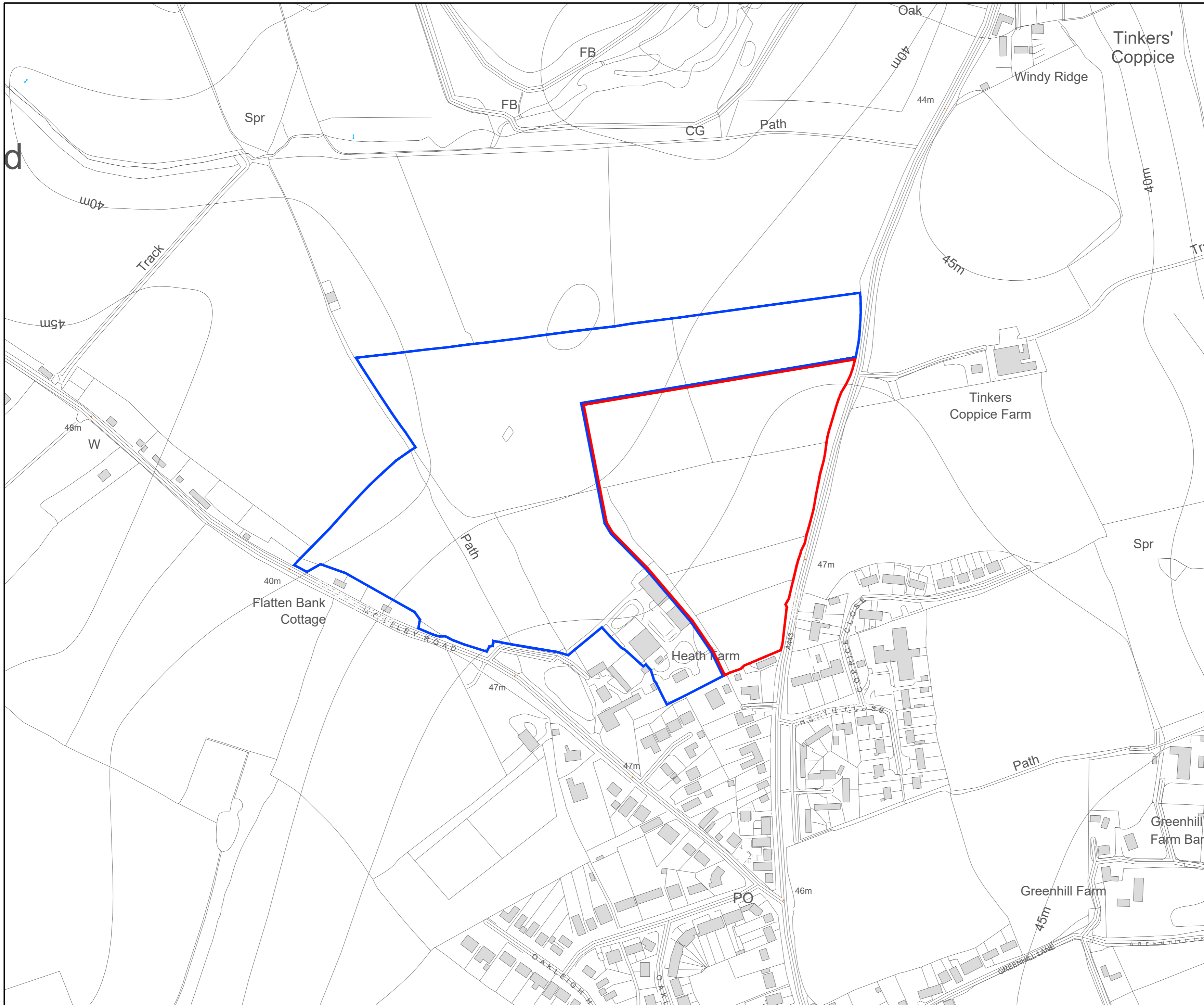
We would welcome the opportunity to discuss the allocation of our Clients land interest and continued engagement with the Neighbourhood Plan process. If you have any queries regarding our representations, please do not hesitate to contact me.

Yours sincerely



GEMMA JOHNSON

Associate Planner



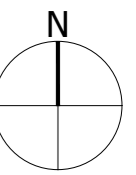
LEGEND

- Site Boundary
- Other Land in Client's Ownership

Project
Hallow Heath

Drawing Title
Site Location Plan

Date 04.08.20	Scale 1:2,500@A2	Drawn by MS	Check by LH
Project No 31066	Drawing No BM-M-06	Revision -	



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LAND WEST OF THE A443, HALLOW HILL

WORCESTERSHIRE

Vision Document
February 2021



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Date 26/02/2021 Status - FINAL Author - DW Checked by - LH

**BARTON
WILLMORE**

1. The Vision

// An attractive well-connected residential development of high quality homes, set within a strong landscape setting, with attractive public open space as part of the proposals. //



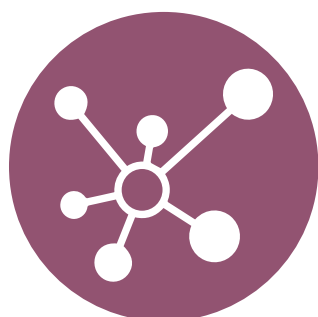
A landscape led new development

Where possible the existing landscape on site will be used to inform the development proposals. The existing trees and hedgerows will provide a structural element to the development. A green edge on the northern part of the site will provide a carefully considered transitional edge.



Creation of high quality homes for all

The development will create new high quality homes within the village, sensitive to the local setting and context, and Hallow Heath's residential community.



A development which enhances connectivity and creates new public open space

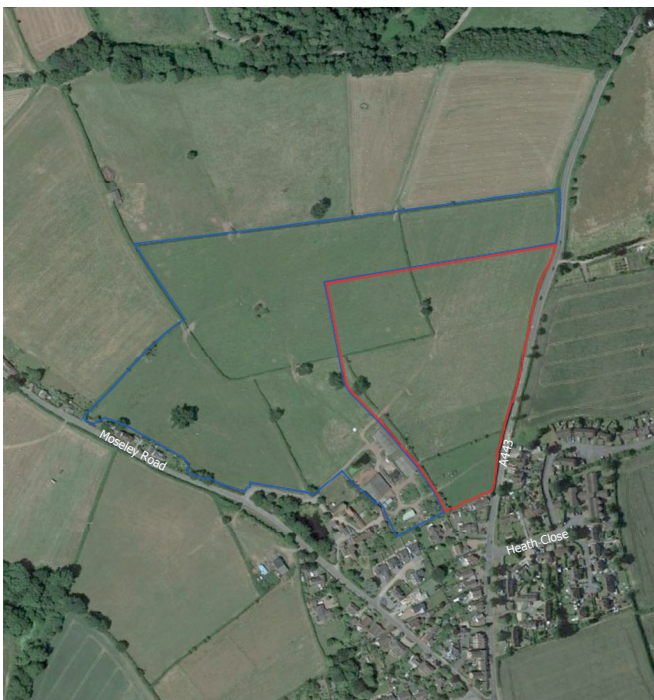
As part of the new development, a large area of public open space will be created, linking to existing public rights of way close to the the site in order to improve local amenity for the proposed and existing communities.

2. Introduction

This Vision Document has been prepared by Barton Willmore on behalf of IM Land Limited. IM Land is working with landowners to support proposals for residential development at the site west of the A443, Hallow Heath.

The purpose of this document is to support the promotion of the site to accommodate residential development and associated public open space. The key aims and objectives of the document are to:

- Present a vision and design framework to guide and shape the proposals
- Review the site in the context of current Planning Policy
- Present an initial understanding of the site and the local context
- Present the emerging concept masterplan, supported by an explanation of the key design principles that have informed it.



Aerial Site Plan

Site Location

The site is located off the A443, Hallow Heath.

Hallow Heath is an area of the village of Hallow, Worcestershire, situated 2 miles north of Worcester and 10 miles south of Kidderminster.

The site is located west of the A443, from which it is accessed, on the Northern Edge of Hallow Heath half a mile north of Hallow village centre. The A443 runs between Newnham Bridge to the north where it meets the A456 and Worcester to the south where it meets the A44, leading to the M5 and wider strategic road network.

The Site

The site measures 4.8ha and is currently in agricultural use. It is bounded as follows:

Northern Boundary: Further agricultural fields lie to the north with some farm buildings and woodland beyond.

Eastern Boundary: The A443 runs along the eastern boundary of the site with fields beyond and existing dwellings to the south east.

Southern Boundary: The built up area of Hallow Heath and Hallow beyond it lie to the south with existing dwellings adjacent to the site along its southern edge.

Western Boundary: Existing Farm building and agricultural fields lie immediately to the west with Moseley Road beyond.

— Site Boundary

— Other Land in Clients Ownership

3. Planning Context

National Planning Policy

The Revised National Planning Policy Framework (NPPF) was published in February 2019, replacing the previous version and is a material consideration in the determination of planning applications. The NPPF also gives guidance on plan-making and how Local Planning Authorities should prepare their Development Plans.

The NPPF sets out the three dimensions of sustainable development:

- An economic role – building a strong and responsive and competitive economy;
- A social role – supporting strong, vibrant and health communities;
- An environmental role – contributing to protecting and enhancing our natural, built and historic environment.

The NPPF plan period seeks to significantly boost the supply of homes by bringing a sufficient amount and variety of land forward.

Paragraph 23 states that “Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development”. When determining the minimum number of houses needed, the NPPF (Paragraph 60) states this should be “informed by a local housing need assessment, conducted using the standard method in national planning guidance”. Further “any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for”.

Paragraph 16 of the NPPF states that plans should:

- Be prepared with the objective of contributing to the achievement of sustainable development;

- Be prepared positively, in a way that is aspirational but deliverable;
- Be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- Be accessible through the use of digital tools to assist public involvement and policy presentation;
- Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

The NPPF further sets out that strategic policies should set out an overall strategy for the pattern, scale and quality of development and make specific provisions for housing (including affordable housing) and other facilities/services. Broad locations for development should be indicated and sufficient sites allocated to deliver the strategic priorities of the area with policies identifying a supply of specific deliverable sites for throughout the Plan Period, which should look ahead over a minimum 15-year period from adoption.

Local Planning Policy

The Site is situated in the administrative area of Malvern Hills District Council and the relevant documents of the Development Plan comprise the South Worcestershire Development Plan (2016).

The adopted South Worcestershire Development Plan (SWDP) is a joint plan involving Malvern Hills District Council, Worcester City Council and Wychavon District Council and sets out a vision that in 2030 South Worcestershire will remain a highly desirable place in which to live and work. The SWDP seeks to provide around 28,400 dwellings during the Plan Period (2006-2030) of which 5,650 are to be located in the MHDC area. A further 4,450 are to be provided in the part of MHDC that lies in the Wider Worcester Area.

The Site is located on the northern edge of Hallow Heath which forms part of Hallow, defined as a Category 1 Village in the SWDP. The SWDP Glossary defines Category 1 villages as being "towns and villages with a good range of services and facilities, as well as some access to public transport". Category 1 settlements are further defined as those having at least four key services and scoring at least 16 points in the Village Facilities Survey. Policy SWDP 2 states that the role of the Category 1, 2 and 3 settlements is to meet locally identified housing and employment needs.

The Plan includes strategic policies such as SWDP 1: Overarching Sustainable Development Principles; SWDP 2: Development Strategy and Settlement Hierarchy; SWDP 3: Employment, Housing and Retail Provision Requirement and Delivery and SWDP 5: Green Infrastructure. It also includes development management policies such as SWDP 6: Historic Environment; SWDP 13: Effective Use of Land; SWDP 14: Market Housing Mix; SWDP 15: Meeting Affordable Housing Needs; and SWDP 21: Design.

There are no designations or allocations on the Site shown on the Policies Map.

Emerging Policy

South Worcestershire Development Plan Review

The South Worcestershire Development Plan is currently being reviewed (SWDPR) and will deal with both strategic cross boundary matters, including overall housing and employment requirements, and also includes detailed development management policies for the Plan Period 2016-2041.

The Preferred Options SWDPR was published in November 2019. It sets out a number of suggested policies for the SWDPR. The key emerging strategic policies for the Site are as follows:

- SWDPR1: Employment, Housing and Retail Requirements – This draft Policy sets out a requirement for at least 13,957 additional dwellings to be delivered in South Worcestershire during the Plan Period.
- SWDPR2: The Spatial Development Strategy and Associated Settlement Hierarchy – Hallow is identified as a Category 1 settlement. These settlements perform some local service centre functions and have a bus service. A level of growth will be expected in these settlements.
- SWDPR4: Green Infrastructure – Identifies a requirement for 40% green infrastructure on greenfield development sites over 1ha. On sites less than 1ha, there is a 20% requirement.
- In addition, it is noted that emerging policy SWDPR13 proposes to include a housing mix based on the latest Strategic Housing Market Assessment and emerging Policy SWDPR14 indicates a requirement for 40% affordable housing to be provided on site.

On 24th July 2020, a statement was published by the South Worcestershire Authorities announcing a delay to the SWDPR due to the recent Covid-19 situation. The latest timetable is now as follows:

- Draft Plan consultation – October 2021
- Submission to the Secretary of State – February 2022
- Examination in Public – late 2022

Discussions with Planning Officers have indicated that some sites identified in the Preferred Options SWDPR have been removed or cannot fulfil the capacity originally anticipated. As such, there may be a need to identify additional suitable sites for development.

Neighbourhood Planning

Hallow Neighbourhood Plan

A draft of the Neighbourhood Plan (NP) for Hallow was published for consultation in June 2020. The NP identifies a housing requirement for Hallow of 22 dwellings and seeks to allocate a single site for a minimum of 40 dwellings. The Draft Policies of particular relevance to the Site are as follows:

- Policy HAL2: Housing Need – Identifies a particular need for affordable housing, bungalows and smaller size dwellings within Hallow;
- Policy HAL8: Green Infrastructure – The Site is identified on the draft Policies Map as Green Infrastructure.

It should be noted that IM Land have submitted representations to the draft NP, including a strong objection to the designation of the Site as GI.

Supplementary Planning Guidance

Design Guide SPD (2018)

This sets out the Council's approach to the design of development proposals focusing on securing high-quality design. This guidance has informed the layout and design of the indicative layout included within this Vision Document.

4. Site Context

The site is located north of Hallow Heath and is within walking distance of facilities and services in Hallow Heath and Hallow village centre.

Access & Movement

The site is accessed from the A443. The A443 is a single carriageway road which runs between Newnham Bridge to the north-east where it meets the A456 and Worcester to the south where it meets the A44, leading to the M5 and wider strategic road network.

A footpath runs along the A443 on the oppsite side of the road to the site with an existing pedestrian crossing point located close to the proposed site entrance.

The site is located within walking distance (0.6 miles / 12 minutes) of the centre of Hallow and 0.2 miles / 4 minutes of the closest facilities in Hallow Heath.

There is a PRow on the west side of the site running north-south, leading into Hallow Heath. Nearby there are further PRowS running east-west both to the north and the south of the site.

Public Transport

The closest bus stops to the site are located:

- On the A443, 4 minutes walk from the site access serving the 294, 296, 308 and 758 routes.

Across all routes there are services to Worcester approximately every hour.

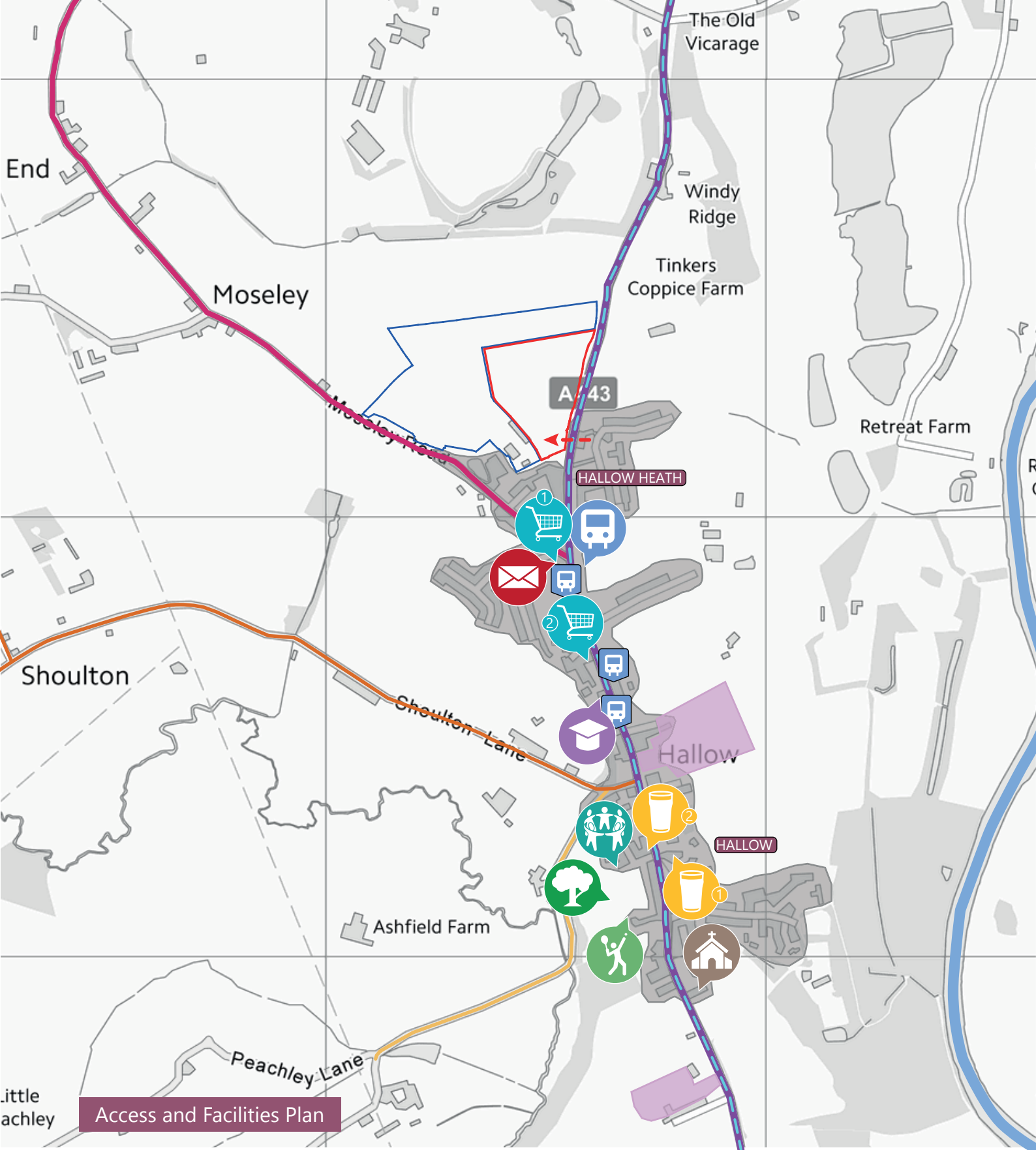
Train Services

The closest railway stations are Worcester Foregate Street and Worcester Shrub Hill and can be reached by a 10 minute and 13 minute car journey respectively. Regular services run from both stations to London Paddington and Hereford with services also from Foregate Street to Birmingham and Shrub Hill to Weymouth.

Local Facilities & Services

The site is located in proximity of Hallow which has a number of facilities within a 12 minute walk of the site. These facilities include shops, a primary school, public house and a social and sports club.

Type	Description	Walking Distance (from site access)	Walk / Cycle Time
Education	Hallow CofE Primary School	0.6km / 0.4 miles	7 minutes / 2 minutes
Food Retail	Hallow Corner Shop Post Office	0.3km / 0.2 miles	4 minutes / 1 minutes
	Ladygo Stores	0.5km / 0.3 mile	6 minutes / 2 minutes
Cafes, Restaurants and Leisure	The Crown Inn (Pub)	1.0km / 0.6 miles	12 minutes / 3 minutes
	Hallow Social & Sports Club	1.0km / 0.6 miles	12 minutes / 3 minutes
	Hallow Parish Hall	1.1km / 0.7miles	14 minutes / 4 minutes
	Hallow Park	1.1km / 0.7 miles	14 minutes / 4 minutes
	Hallow Tennis Club	1.3km / 0.8 mile	15 minutes / 4 minutes



Access and Facilities Plan

LEGEND

-  Site Boundary
-  Other Land in Clients Ownership
-  New Developments
-  Primary Site Access
-  Hallow Heath Road / A443
-  Moseley Road
-  Shoulton Lane
-  Broadheath Lane
-  Bus Route (296/758)
-  River Severn
-  Bus Stops
-  Hallow Post Office
-  Hallow Park
-  Shops
 - 1. The Corner Shop Post Office
 - 2. Ladygo Store
-  Hallow C of E Primary School
-  Hallow Tennis Club
-  St. Philip & St. James Church
-  Hallow Parish Hall
-  Pubs
 - 1. Hallow Sports and Social Club
 - 2. The Crown Inn
-  Nearest Bus Stop to Site

5. Opportunities & Constraints

The findings from the initial site and context assessment have been evaluated to identify the emerging constraints and opportunities relevant to the development of the site.

The composite plan in this section presents the analysis of these elements, the qualities of the site and its immediate setting that provides the context for future development proposals. The positive features and opportunities on and around the site should be retained, enhanced and incorporated into the scheme where possible, to strengthen local distinctiveness.

Key Opportunities

Public Rights of Way running close to the site present excellent opportunities to link into nearby pedestrian and cycle routes and create enhanced connectivity through the site and into the wider movement network.

The site is located within Flood Zone 1, meaning there is a low probability of flood risk and suitable for residential development.

The site is in close proximity to nearby bus stops, just 4 minutes walk from the site.

There is existing planting along the boundaries of the site which, with further enhancement, will create a sensitive green transitional edge.

The site is relatively flat with little to no elevational changes.

The site is in close proximity to shops and other facilities in Hallow, all within a 15 minute walk of the site.

There is potential for access from the A443.

There is a significant feature tree on the site (alongside three off-site) which will be retained within the development proposals.

Key Constraints

Existing houses to the south and west will need to be carefully considered. Rears of existing properties will be backed onto by proposed development and fronts will be fronted onto to mitigate any potential issues.



LEGEND

- Site Boundary
- Other Land in Clients Ownership
- Public Rights of Way
- Rears of Adjacent Properties
- Bus Stops
- Existing Trees / Hedgerows
- Significant Feature Trees for Retention
- Existing Adjacent Buildings
- Existing Foul Water Outfall
- Existing Pond on Site

Access & Transport

The site is bound to the east by the A443 and to the southwest by Moseley Road. The A443 is approximately 6m wide with a footway along the eastern side and is subject to national speed limit north of the existing built-up area of Hallow Heath. The A443 provides a connection (south) to Worcester and (north) to Stourport-on-Severn and (northwest) towards Tenbury Wells. Moseley Road is approximately 5.5m wide, has no central line markings or no footways past the site, but is subject to a 30mph speed limit past the site. Moseley Road provides a connection (north) to the small settlement of Sinton Green and (south) to a junction with the A443 in Hallow (Moseley Turn).

The site is situated to the north of Hallow Heath, which is to the north of Worcester city centre. The River Severn provides a barrier to the east of Hallow with the closest bridge crossings in Worcester City Centre to the south or Holt Fleet to the north.

Improving footway connections between the site and Hallow Heath and Hallow will form part of the proposals.

The most appropriate location for a site access would be off the 30mph zone of the A443 towards the southern section of the site.

A simple priority T-junction arrangement is the proposed form of access junction.

A secondary access onto Moseley Road for pedestrians and cyclists would likely be required.

Heritage & Archaeology

Within the wider landscape there are no World Heritage Sites, Scheduled Monuments, Registered Historic Parks and Gardens or Registered Battlefields that will be affected by the development proposals. Located within 400 metres of the northern boundary of the site there are two Grade II listed structures. The entrance lodge to Thorngrove is a mid 19th century structure with 20th century modifications and alterations. The bridge within the grounds of Thorngrove is also a Grade II listed structure, dating from the early 19th century. There is also a collection of Grade II listed buildings to the south of the site, in the centre of Hallow Heath. However, all of these listed structures are well screened from the site, and therefore any development on this site is unlikely to impact the character of these listed assets.

Sand & Gravel

Sand and gravel deposits have been identified on land in close proximity to the Site. If the Site is affected, it will be possible to extract any deposits prior to development.

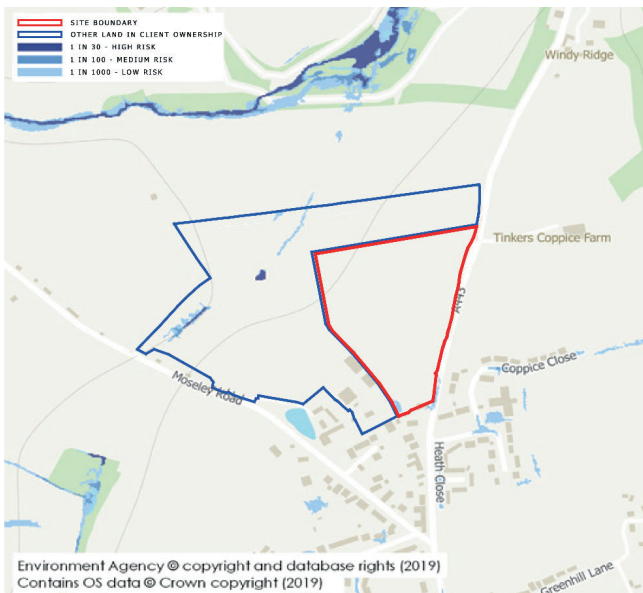
Agricultural Land

The Site is classified as best and most versatile in terms of agricultural land. However, it is noted that all of the land surrounding the built up area of Hallow is also best and most versatile. As such, there is no lower grade agricultural land available to meet the housing needs of the village.

Flood Risk & Drainage

According to the Environment Agency Flood Map for Planning, the application site is located entirely within Flood Zone 1 (low probability of flooding), which is land defined as having less than a 1 in 1000 annual probability of river or sea flooding. The nearest Environment Agency Main River is Laughern Brook, which is located approximately 740m south of the site. Located approximately 380m to the north of the site is an unnamed watercourse.

The pluvial flood risk, according to Environment Agency mapping, appears to be confined to the ditch and pond and presents a Low (1 in 1000 year) to High (1 in 30 year) risk. Given site levels the existing ditch is considered not to form any potential risk or constraint to development of the site.



Flood Risk Map (Environment Agency)

The proposed development has also been assessed against a further range of potential flood risk sources including surface water, canals, groundwater, reservoirs and sewers. None of the other flood sources have found to present a potential barrier to development.

The existing site is largely greenfield in nature, with a cluster of agricultural buildings to the south of the site. The topography of the site falls to the north and north-west with a valley line which runs in a north easterly direction.

An appropriate Surface Water Management Strategy which complies with the latest local and national advice will be implemented on the site to attenuate the increase in surface water runoff caused by development. As a first option, infiltration should be considered for the disposal of surface water and infiltration testing should be carried out at the earliest possible convenience. In the event that infiltration is not viable, the rate at which the runoff is discharged into the ditch on site will be restricted to the equivalent greenfield runoff rate, preventing an increase in flows leaving the site and thus ensuring that the development does not have a detrimental impact upon flood risk elsewhere.

Through the application of Sustainable Urban Drainage Systems (SUDS), the additional surface water will be stored within the site and subjected to multiple stages of treatment to guarantee that the water quality in the wider drainage network is protected. Wherever possible SUDS features will be above ground to enhance the aesthetic amenity of the development and provide valuable habitats for the local wildlife. The attenuation provided will be appropriately sized to include an allowance for climate change. Example SUDS features that will be incorporated into the development wherever possible include attenuation basins, permeable paving and swales.

Air Quality

The Site is not located within, or adjacent to, an Air Quality Management Area (AQMA). The closest AQMA to the Site is the Worcester AQMA located approximately 1.3km southeast; this AQMA was declared by Worcester City Council (WCC) for the exceedance of the annual mean nitrogen dioxide (NO₂) objective. The Site lies within the administrative area of Malvern Hills District Council (MHDC); MHDC do not currently have any AQMAs in their administrative area. There is no air quality monitoring undertaken in the local area however, there are existing residential dwellings adjacent to the Site and along the local road network which has not been declared and AQMA and this suggests that air quality at the Site is currently below the relevant air quality objectives.

Utilities

Within the development site boundary, an Over Head (OH) cable is located south of the development site. There is an opportunity to underground or divert the existing OH line within the masterplan.

Early indication is that utility capacity can be provided by existing infrastructure or through network reinforcing works. The infrastructure for the gas, electricity, water and telecoms is in close proximity.

It is not anticipated that any of these utilities identified are in any way a barrier to the development site and there is no reason why the development should not be allocated from a utilities perspective.

Landscape

The site itself lies on the northern edge of Hallow Heath with existing residential receptors on the northern edge of the village and surrounding farm steads and properties. A sensitive design response will be required to ensure an appropriate interface with these properties. Similarly, the A443 and Moseley Road run along the eastern and western parts of the site respectively, views from these should be considered and landscape planting proposed to filter these views.

The Site includes land forming the northern extent of the plateau on which Hallow has evolved, before falling into a side valley, which forms a natural edge to the expansion of the settlement. The wider landscape includes open fields with hedgerows and hedgerow trees present. A large wooded shelterbelt runs east to west north of the Site. There are long distance open views to the surrounding hills. Generally given the open nature of the landscape proposed planting should be considered to filter views. The public right of way running through the site will be retained and fronted onto, enhancing the quality of this route. Where possible, existing trees and hedgerows will be retained within the development proposals.

A strong new defensible boundary can be created along the northern part of the site. An expansive green edge with public space and planting will filter views of the development from the north and provide a transitional landscape element moving from the built environment towards the countryside to the north.

Overall, with an appropriate design approach, any visibility constraints can be suitably mitigated and would not provide a constraint to development.

Noise

The existing noise climate on the proposed development site is likely to be from road traffic on the A443 and Moseley Road. Although, Moseley Road is a single-track road and is therefore unlikely to carry significant traffic flow.

To protect external amenity areas such as gardens of proposed dwellings located closest to the A443 and Moseley Road, gardens could be located on the screened side of dwellings. Alternatively, acoustic fencing could be utilized between the road and proposed outdoor living areas. To protect internal amenity, it is likely that uprated ventilation will be required.

Social Infrastructure

The site has existing opportunities to connect to the services and facilities of Hallow and Worcester beyond which will be encouraged by the provision of footpaths and movement corridors within the site connecting to the existing footpaths along the A443.

Ecology

There are no designated ecological sites close to the Site and therefore, consideration of any potential ecological impacts as a result of the proposed development would not provide a constraint to development.

The habitats within the Site comprise grazing pasture of low of ecological value. Hedgerows and mature trees are present on the site, and so may hold some ecological/arboricultural value, although these would not a constraint to development. There are also ponds within the redline boundary and immediately adjacent, their loss may have little impact to the ecological value of the site, although further assessment would be needed to confirm this.

Biodiversity can either be increased on-site through a biodiversity metrics calculation or through off-site mitigation; this may involve a financial contribution to local habitat management/creation schemes.

The site is within an SSSI risk zone, however through detailed design this potential constraint can be overcome with appropriate mitigation incorporated within the proposed layout.

There is a potential for species such as bats, badgers, amphibians, birds, and reptiles to occupy the site, although the presence of any protected species is highly dependent on the condition of the habitat on site. Further data would need to be gathered, in the first instance, through a Preliminary Ecological Appraisal, with any species-specific surveys recommended following this initial assessment.

Through the inclusion of Public Open Space, any protected species found on the site can be translocated to compensatory habitat provided in this area.

Overall, it is considered that, even if protected species are discovered on site, the layout and design of the scheme can address these and suitably mitigate any potential impacts.

Sustainable Development

Sustainable development has three overarching objectives, being economic, social and environmental, and planning should therefore perform each of these roles (NPPF Paragraph 8). When judged against these objectives, the proposed development satisfies the definition of sustainable development for the following reasons:

- **Economic Role:** The proposed residential development will contribute to the economy through local construction jobs during the construction phase of the development. Furthermore the potential use of local tradesmen and services along with materials will help to sustain the local economy through supply chain multipliers. Finally, once the dwellings are occupied, the addition of new residents within Hallow will result in a boost to the local economy and will help sustain existing businesses through additional expenditure in local shops and services.
- **Social Role:** The delivery of between 120 - 140 dwellings has the potential to contribute towards the creation of a strong and vibrant community in this part of the District. This could be delivered as part of a phased programme of construction to meet local housing need. The proposal would incorporate areas of publicly accessible open space and will be designed to integrate with the existing residential area to the south of the Site, ensuring that wider community benefits can be secured. The scheme will provide a mix of market, shared ownership and affordable dwellings, incorporating a mix of dwelling type and size. This will help to increase the range and type of dwellings and tenures available within the locality, contributing to the creation of a more mixed and balanced community.
- **Environmental Role:** The proposed development is landscape led and will make a positive contribution towards the quality of the built environment through the careful design and layout of the proposed dwellings and amenity space. The proposals are also capable of contributing to the protection and enhancement of the natural environment by minimising the use of natural resources and minimising waste and pollution. There will be opportunities for biodiversity enhancements through the delivery of areas of open space and extensive landscaping across the Site. Existing trees will be retained and additional planting and landscaping will be included throughout.

6. The Proposals

Key Guiding Design Principles

The proposals for the site have been informed by the vision, site analysis and identified constraints and opportunities. The plan shows the key design principles which underpin the development of the site, as set out below:









- The proposal provides for approximately 2.1 ha of residential development land, achieving approximately 60 dwellings using an average density of 30 dwellings per hectare (dph).
- Vehicle access to the site will be provided by the A443 to the east.
- The development will create a well-connected local movement network, integrating the development within the existing wider network.
- The retention and enhancement of existing landscape wherever possible, to shape a connected and multi-functional green infrastructure network – including recreation, ecological habitats and attenuation
- Extensive new public open space provided for recreation in the centre, the west and the north of the development.



- Site Boundary
- Other Land in Client's Ownership
- Proposed Development Area
- Proposed Public Open Space
- Proposed Infrastructure



Concept Plan

-  Site Boundary
-  Other Land in Client's Ownership
-  Primary Route & Access
-  Secondary Routes
-  Development Areas
-  Landscaping & Trees
-  Public Open Space
-  SUDs

NUMERICAL KEY

- ① Access
- ② Appropriate Boundary and Frontage Toward A443
- ③ Proposed Green Northern Edge and Appropriate Transition
- ④ Indicative Attenuation Pond
- ⑤ Retained Feature Tree
- ⑥ Central Village Green Area
- ⑦ Retained Hedgerow
- ⑧ Proposed Residential Development
- ⑨ Retained Feature Trees Adjacent to the Site

7. Development Benefits

The development could deliver approximately 60 high quality new homes and a large area of public open space.



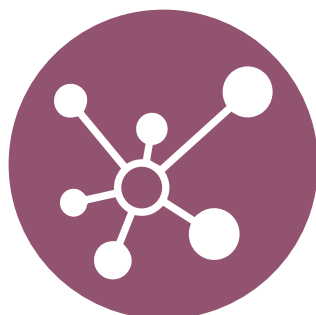
A landscape led new development

Where possible the existing landscape on site will be used to inform the development proposals. The existing trees and hedgerows will provide a structural element to the development. A green edge on the northern part of the site will provide a carefully considered transitional edge.



Creation of high quality homes for all



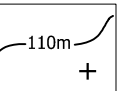
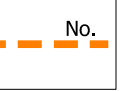


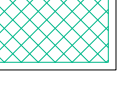
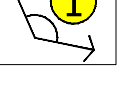



The development will create new high quality homes within the village of Hallow, sensitive to the local setting and context, within Hallow Heath's residential community.

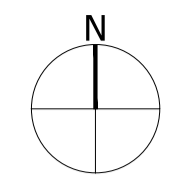


A development which enhances connectivity and creates new public open space

As part of the new development, a large area of public open space will be created, linking to existing public rights of way close to the site in order to improve local amenity for the proposed and existing communities.

LEGEND

-  Site Boundary
-  Existing Water Courses and Features ^
-  Contours/Spot Heights (Metres AOD) ^
-  Public Rights of Way *
-  Listed Buildings ~
-  Ancient Woodland #
-  Traditional Orchards #
-  Location of Photographic Viewpoints (Site Photographs: 1-8)
-  Open Views
-  Partial Views
-  Truncated / No Views



Sources:
 # OS Mapping
 # Natural England GIS Data Set
 ~ Historic England National Monument Record GIS Data Set
 * Worcestershire County Council PROW Interactive Map

Data collected for constraints and analysis mapping is based on publicly available sources at the time of preparation; inserted using the British National Grid and may itself not be accurate. Barton Willmore shall not be liable for the accuracy of data derived from external sources.



FIGURE 1

Project
Hallow Heath

Drawing Title
Landscape and Visual Appraisal Plan

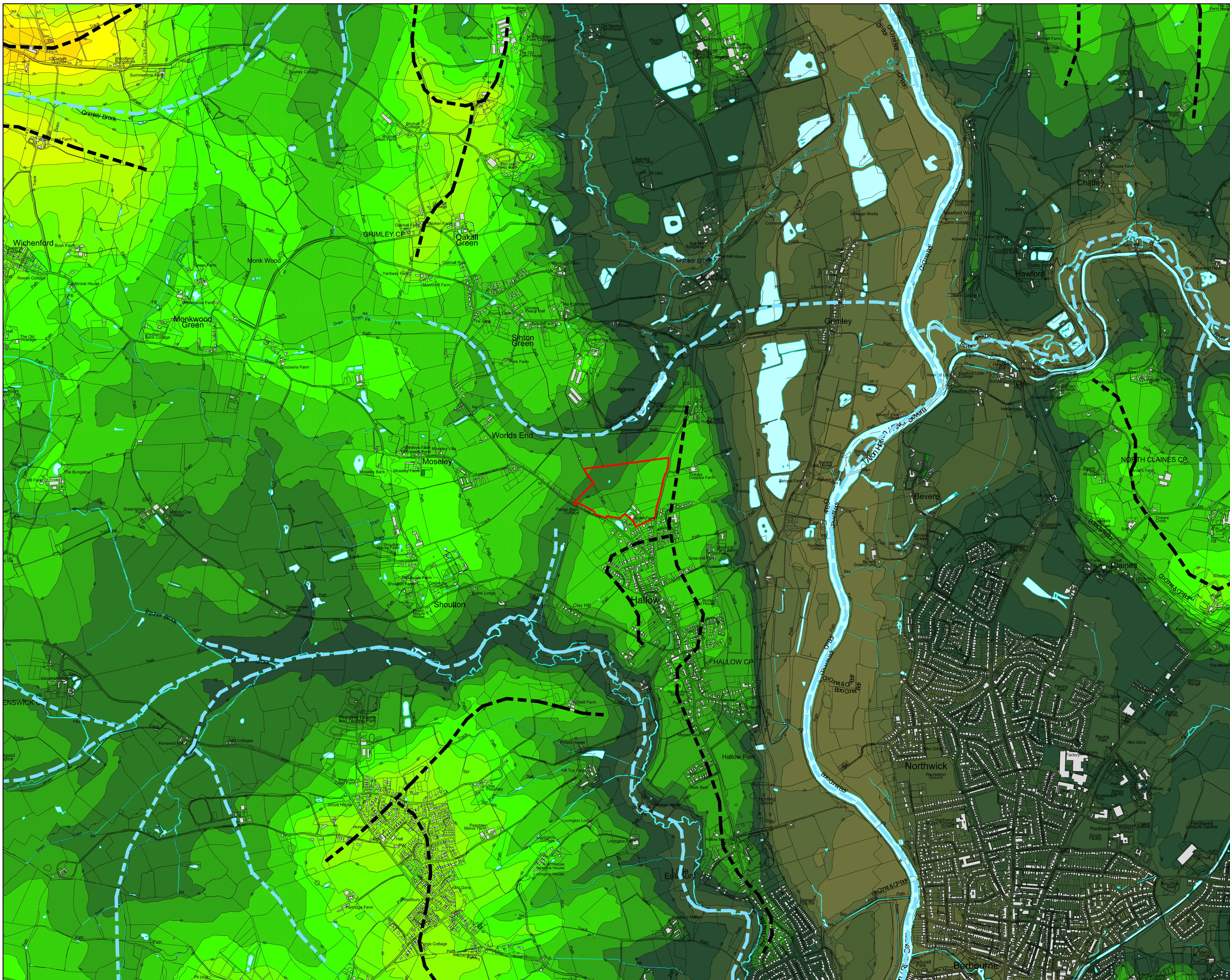
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26.02.21	1:2,500 @A1 1:5,000 @A3	DK/GS	PC
Project No	Drawing No	Revision	
31066	LN-LP-01	-	

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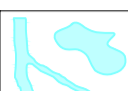
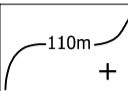


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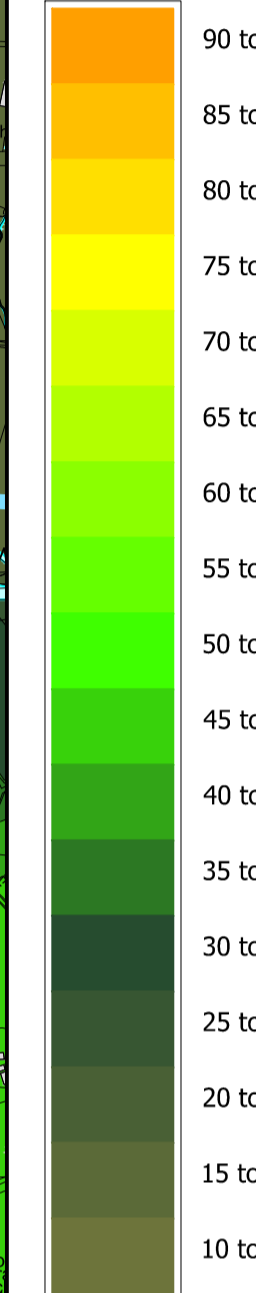


The scaling of this drawing cannot be assured
 Revision _____ Date _____ Dm _____ Ckd _____

LEGEND

-  Site Boundary
-  Existing Water Courses and Features ^
-  Contours/Spot Heights (Metres AOD) ^
-  Ridgelines
-  Valleys

Elevation (m AOD)



Sources: ^ OS Mapping
 Data collected for constraints and analysis mapping is based on publicly available sources at the time of preparation. Inevitably using the British National Grid and may itself not be accurate. Barton Willmore shall not be liable for the accuracy of data derived from external sources.

FIGURE 2

Project
Hallow Heath

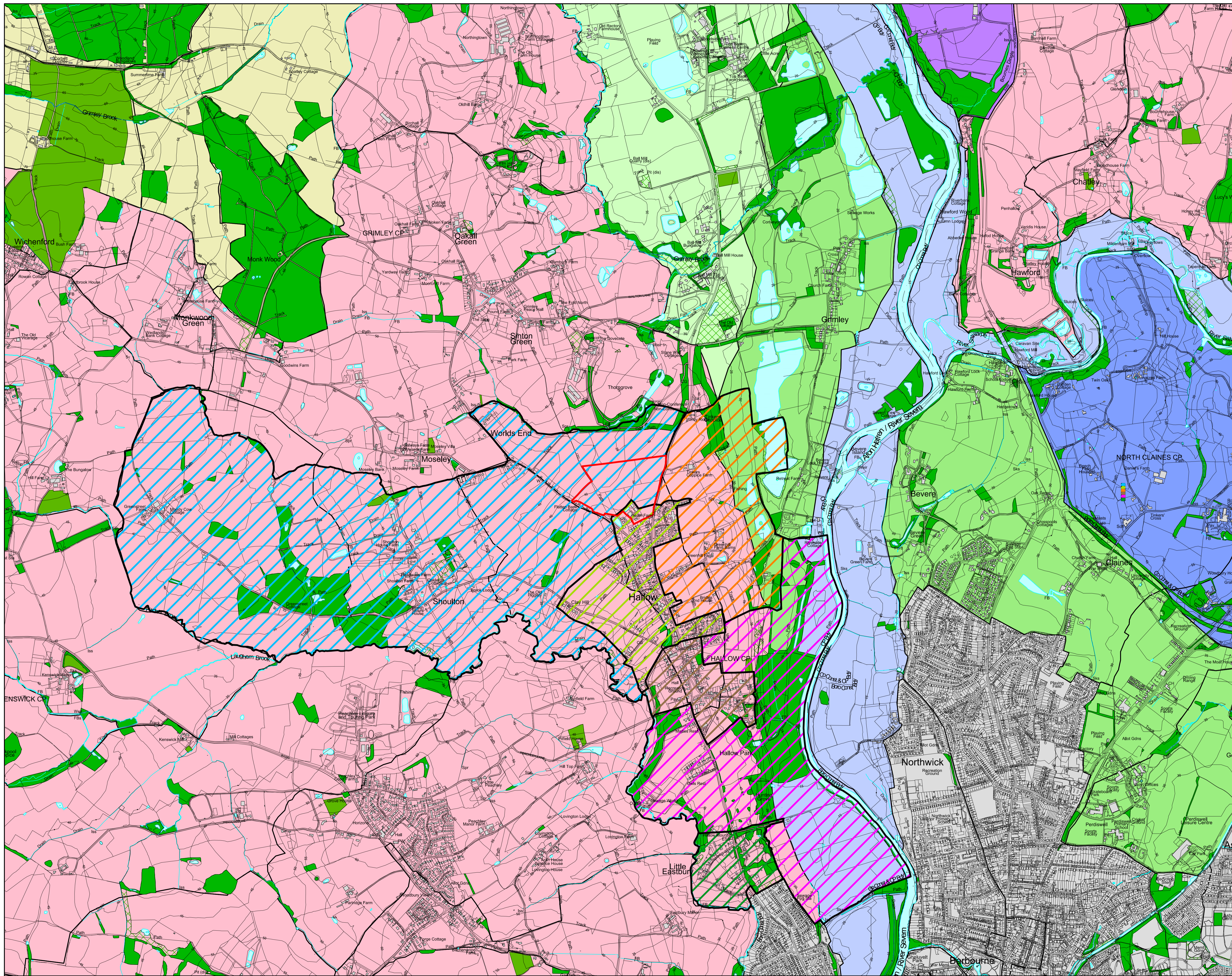
Drawing Title
Topographical Features Plan

Date 23.02.2021	Scale 1:10,000 @A1 1:20,000 @A3	Drawn by ML	Check by PC
Project No 31066	Drawing No LN-LP-02		Revision -



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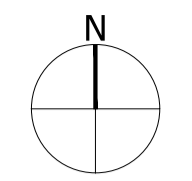
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The scaling of this drawing cannot be assured
 Revision _____ Date _____ Dm _____ Ckd _____

LEGEND

- Site Boundary
- Existing Woodlands, Copses and Tree Belts ^
- Existing Scrub ^
- Existing Water Courses and Features ^
- Contours/Spot Heights (Metres AOD) ^



National Landscape Character Profiles ^

Plan extents lie entirely within 106, Severn and Avon Valles

Worcestershire Landscape Character

- Character Type**
EF / Estate Farmlands
Character Areas
Omberley Park Sandlands (MW121a)
- Character Type**
RM / Riverside Meadows
Character Areas
River Salwarpe (MW114a)
Severn Hotflleet - Worcester (MWS1ab1d) (MWS11)
Severn Stourport - Hotflleet (MWS1h)
- Character Type**
SFpa / Settled Farmlands with Pastoral Land Use
Character Areas
Claines Farmland (MW112.1c)
Fenhill Heath Farmland (MW112.2a)
- Character Type**
SFpr / Principal Settled Farmlands
Character Areas
Grimley Sandlands (MWS2a)
- Character Type**
SFrt / Settled Farmlands on River Terrace
Character Areas
Claines Farmlands (MW113d)
Grimley Sandlands (MW53a)
Perdiswell Urban Fringe (MW113a1b1c)
- Character Type**
TF / Principal Timbered Farmlands
Character Areas
Broadheath Farmlands (MW54e)
Chattle Farmlands (MW119.3b1k)
Crown East Farmland (MW54f \ MW56a1c)
Hallow Farmlands (MW54c1d)
Kenswick Farmland (MW55.1k)
Knights Grove (MW119.3p)
Laugharne Brook Farmlands (MWS5.1d1h1)
Omberley Park Sandlands (MW120c)
Ockeridge Orchard Farmlands (MW46.1b1c \ MWS5.1a)
Ockeridge Farmlands (MWS54a)
Sinton Green Farmlands (MWS4b)
Wichenford Farmlands (MWS5.1c1e)
- Character Type**
WE / Wooded Estatelands
Character Areas
Ockeridge Farmlands (MW47.1c1d1e1g)
Ockeridge Orchards Farmlands (MW47.1b1f)
Ockeridge Farmlands (MW48.1f)
- Character Type**
U / Urban
Character Areas
Worcester (MWS8c)
(MWS5c \ MW60a1b1c1d1e \ MW61c1e)
- Hallow Neighbourhood Character Areas
Moseley/Shoulton Farmlands
- Hallow Village
- Hallow Farmlands
- Conservation Area
- Landed Estates
- Parkfield

Sources:
 * OS Mapping
 * Worcestershire County Council GIS Data Set
 * Hallow Parish Council, Hallow Design Guide, June 2019
 Data collected for constraints and analysis mapping is based on publicly available sources at the time of preparation inserted using the British National Grid and may itself not be accurate. Barton Willmore shall not be liable for the accuracy of data derived from external sources.


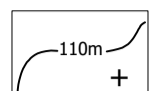










FIGURE 3
 Project
 Hallow Heath

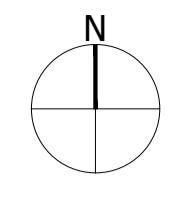
Drawing Title
 Landscape Character Plan

Date	Scale	Drawn by	Check by
23.02.2021	1:10,000 @A1 1:20,000 @A3	ML	PC
Project No	Drawing No	Revision	
31066	LN-LP-03	-	

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LEGEND

-  Site Boundary
-  Contours/Spot Heights (Metres AOD)
-  Public Rights of Way
-  Existing Canopy Trees
-  Existing Hedgerows
-  Development Area
-  Proposed Parkland
-  Proposed Wetland Valley Floor
-  Proposed Clumps of Oak Canopy Trees
-  Proposed Hedgerow Trees
-  Positive Focal Feature (off Site)
-  Internal Views



- 1 Hedgerow trees as entrance corridor to settlement, providing more rural version of lime trees further south
- 2 Clump of oak canopy trees as gateway features, softening edge of settlement and counteracting formality of poplars to the east
- 3 Parkland valley flanks - accessible open space with meadow grassland and existing and proposed structural canopy trees, forming a positive setting to built development
- 4 Potential for SuDS as part of visually interesting and biodiverse wetland
- 5 Potential for parcel respecting low density of settlement extending to the north-west, with reinforced hedgerow vegetation
- 6 Maintain view corridor along PROW to wider landscape
- 7 Maintain green gap to provide views in towards the positive focal feature of Heath Farm barn building as well as to preserve views out



FIGURE 4

Project
Hallow Heath

Drawing Title
Landscape and Visual Opportunities and Constraints Plan

Date	24.02.21	Scale	1:2,500@A1 1:5,000 @A3	Drawn by	DD	Check by	PC
Project No	31066	Drawing No	LN-LP-04	Revision	-		

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Residential development in Hallow

Heath Farm

Residential development on Moseley Road, Hallow

Approximate extent of the Site



**SITE PHOTOGRAPH 1: VIEW FROM A443 FOOTWAY, EAST OF SITE
PANORAMIC PHOTOGRAPH: NOT TO SCALE AND FOR CONTEXT ONLY**



ACTUAL SIZE EXTRACT, HORIZONTAL FIELD OF VIEW 76.9°, TO BE VIEWED AT A COMFORTABLE ARM'S LENGTH @A3

Approximate distance from the Site boundary: 14m

Visualisation Type: Type 1 Annotated Viewpoint Photograph
Camera: Canon 6D with 50mm fixed lens



HALLOW HEATH

SITE PHOTOGRAPH: 1

DATE TAKEN: FEB 2021
PROJECT NUMBER: 31066

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Tinker's Coppice Farm

Approximate extent of the Site

Residential development on Moseley Road, Hallow

Woodland on boundary of Thorngrove



**SITE PHOTOGRAPH 2: VIEW FROM A443 FOOTWAY, NORTH-EAST OF SITE
PANORAMIC PHOTOGRAPH: NOT TO SCALE AND FOR CONTEXT ONLY**



ACTUAL SIZE EXTRACT, HORIZONTAL FIELD OF VIEW 76.9°, TO BE VIEWED AT A COMFORTABLE ARM'S LENGTH @A3

Approximate distance from the Site boundary: 51m

Visualisation Type: Type 1 Annotated Viewpoint Photograph
Camera: Canon 6D with 50mm fixed lens

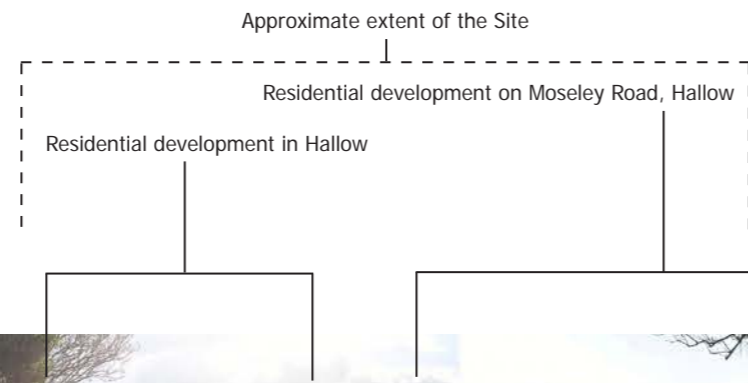


HALLOW HEATH

SITE PHOTOGRAPH: 2

DATE TAKEN: FEB 2021
PROJECT NUMBER: 31066

**BARTON
WILLMORE**



SITE PHOTOGRAPH 3: VIEW SOUTH-WEST FROM A443 FOOTWAY AT JUNCTION WITH PROW 528C
PANORAMIC PHOTOGRAPH: NOT TO SCALE AND FOR CONTEXT ONLY



ACTUAL SIZE EXTRACT, HORIZONTAL FIELD OF VIEW 76.9°, TO BE VIEWED AT A COMFORTABLE ARM'S LENGTH @A3

Approximate distance from the Site boundary: 148m

Visualisation Type: Type 1 Annotated Viewpoint Photograph
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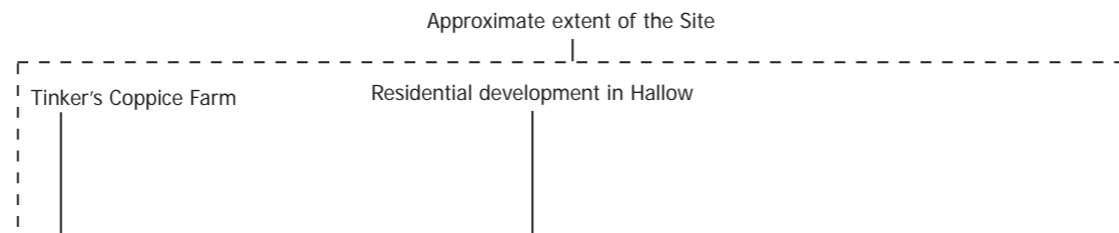


HALLOW HEATH

SITE PHOTOGRAPH: 3

DATE TAKEN: FEB 2021
 PROJECT NUMBER: 31066

**BARTON
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SITE PHOTOGRAPH 4: VIEW SOUTH FROM PROW 528C
PANORAMIC PHOTOGRAPH: NOT TO SCALE AND FOR CONTEXT ONLY



ACTUAL SIZE EXTRACT, HORIZONTAL FIELD OF VIEW 76.9°, TO BE VIEWED AT A COMFORTABLE ARM'S LENGTH @A3

Approximate distance from the Site boundary: 168m

Visualisation Type: Type 1 Annotated Viewpoint Photograph
 Camera: Canon 6D with 50mm fixed lens

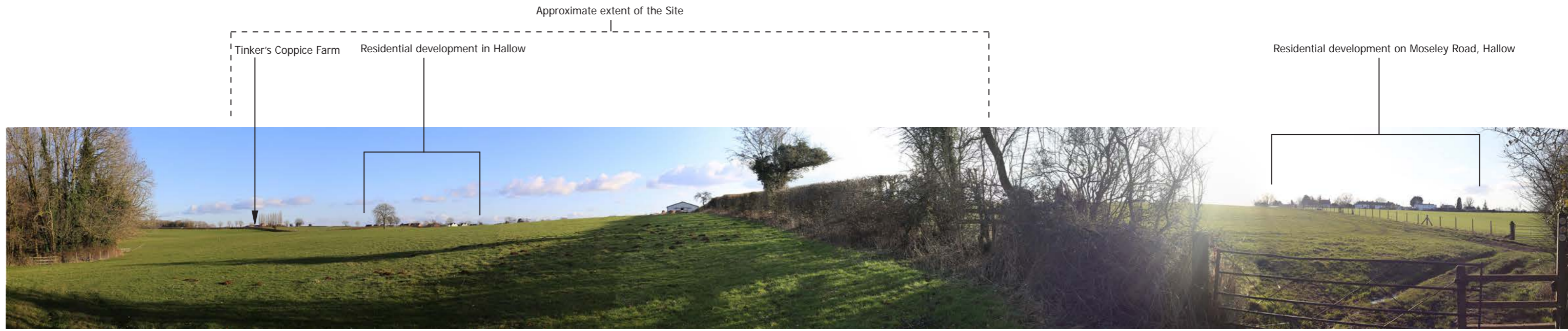


HALLOW HEATH

SITE PHOTOGRAPH: 4

DATE TAKEN: FEB 2021
 PROJECT NUMBER: 31066

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SITE PHOTOGRAPH 5: VIEW SOUTH-EAST FROM PROW 528C AT JUNCTION WITH PROW 530C
PANORAMIC PHOTOGRAPH: NOT TO SCALE AND FOR CONTEXT ONLY



ACTUAL SIZE EXTRACT, HORIZONTAL FIELD OF VIEW 76.9°, TO BE VIEWED AT A COMFORTABLE ARM'S LENGTH @A3

Approximate distance from the Site boundary: 204m

Visualisation Type: Type 1 Annotated Viewpoint Photograph
 Camera: Canon 6D with 50mm fixed lens

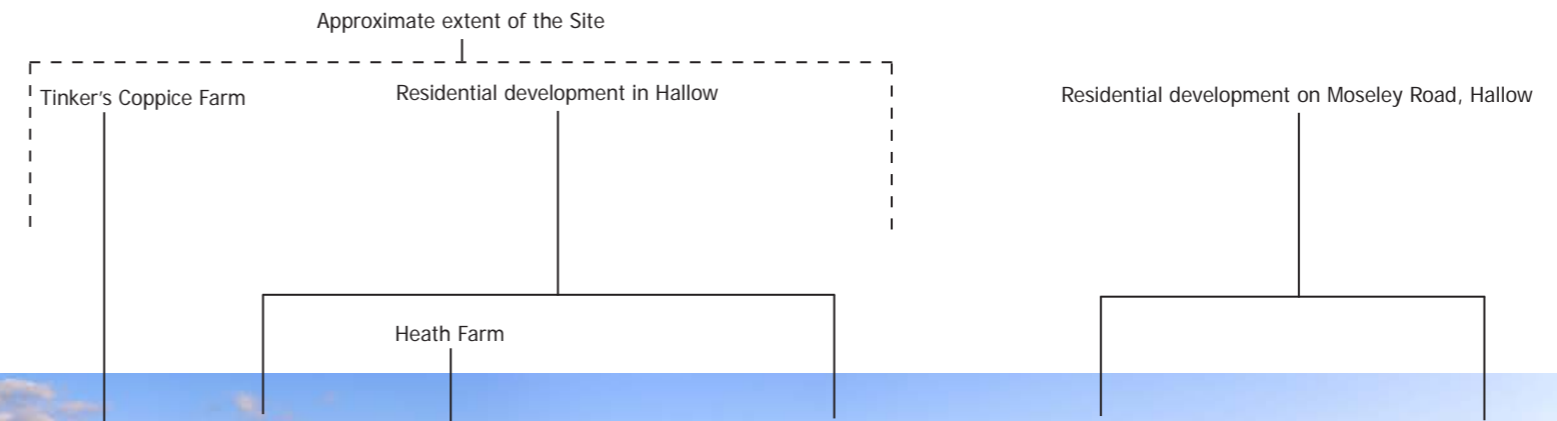


HALLOW HEATH

SITE PHOTOGRAPH: 5

DATE TAKEN: FEB 2021
 PROJECT NUMBER: 31066





SITE PHOTOGRAPH 6: VIEW SOUTH-EAST FROM PROW 530C IN VICINITY OF MOSELEY ROAD
PANORAMIC PHOTOGRAPH: NOT TO SCALE AND FOR CONTEXT ONLY



ACTUAL SIZE EXTRACT, HORIZONTAL FIELD OF VIEW 76.9°, TO BE VIEWED AT A COMFORTABLE ARM'S LENGTH @A3

Approximate distance from the Site boundary: 216m

Visualisation Type: Type 1 Annotated Viewpoint Photograph
 Camera: Canon 6D with 50mm fixed lens



HALLOW HEATH

SITE PHOTOGRAPH: 6

DATE TAKEN: FEB 2021
 PROJECT NUMBER: 31066

**BARTON
 WILLMORE**

Approximate extent of the Site

Residential development on Moseley Road, Hallow

Tinker's Coppice Farm



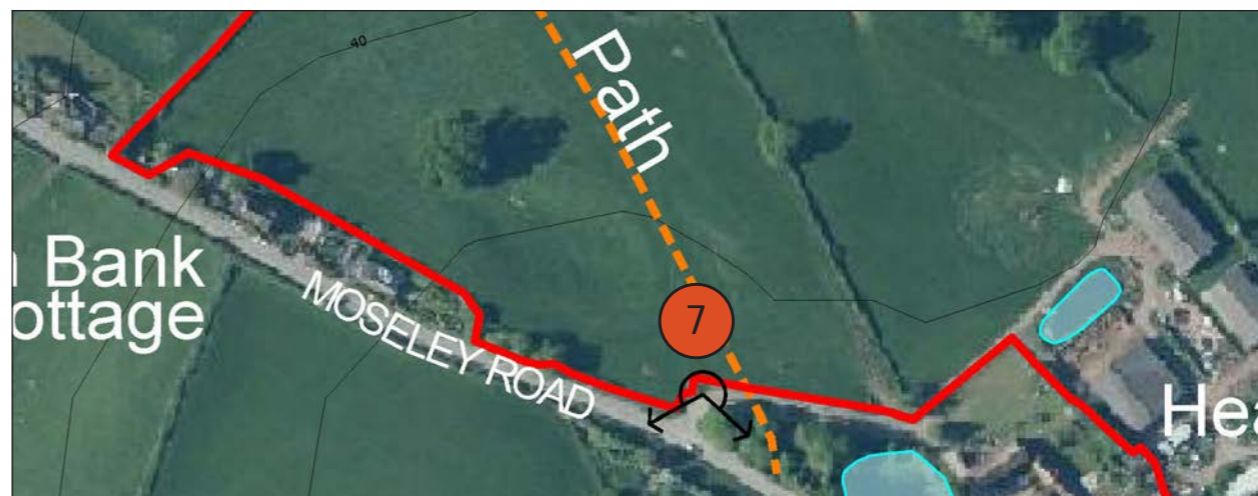
SITE PHOTOGRAPH 7: VIEW NORTH-EAST FROM PROW 530C IN THE VICINITY OF HEATH FARM
PANORAMIC PHOTOGRAPH: NOT TO SCALE AND FOR CONTEXT ONLY



ACTUAL SIZE EXTRACT, HORIZONTAL FIELD OF VIEW 76.9°, TO BE VIEWED AT A COMFORTABLE ARM'S LENGTH @A3

Approximate distance from the Site boundary: 4m

Visualisation Type: Type 1 Annotated Viewpoint Photograph
Camera: Canon 6D with 50mm fixed lens

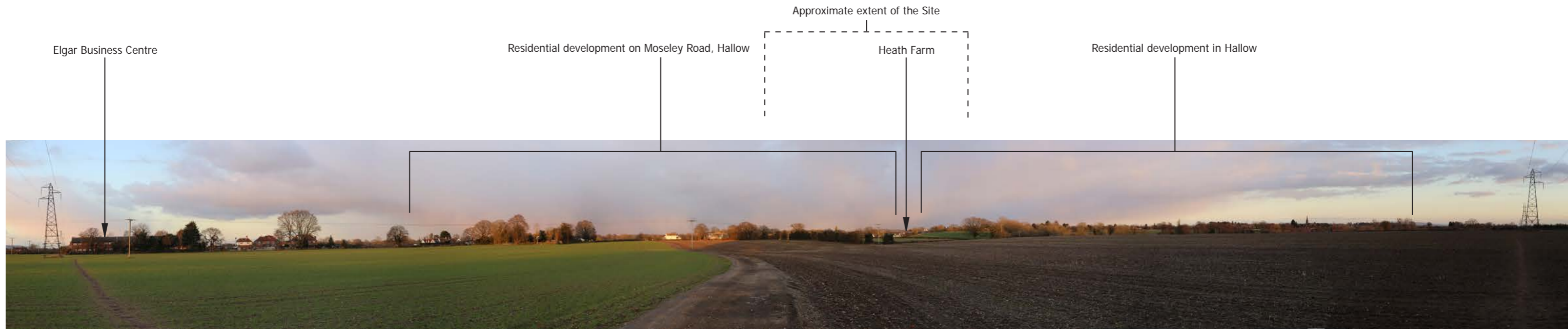


HALLOW HEATH

SITE PHOTOGRAPH: 7

DATE TAKEN: FEB 2021
PROJECT NUMBER: 31066

**BARTON
WILLMORE**



SITE PHOTOGRAPH 8: VIEW EAST FROM PROW 572B AT JUNCTION WITH OTHER PROW
PANORAMIC PHOTOGRAPH: NOT TO SCALE AND FOR CONTEXT ONLY



ACTUAL SIZE EXTRACT, HORIZONTAL FIELD OF VIEW 76.9°, TO BE VIEWED AT A COMFORTABLE ARM'S LENGTH @A3

Approximate distance from the Site boundary: 569m

Visualisation Type: Type 1 Annotated Viewpoint Photograph
 Camera: Canon 6D with 50mm fixed lens



HALLOW HEATH

SITE PHOTOGRAPH: 8

DATE TAKEN: FEB 2021
 PROJECT NUMBER: 31066

**BARTON
WILLMORE**

Land at Hallow Heath: Initial Landscape and Visual Appraisal

Prepared on behalf of IM Land Limited

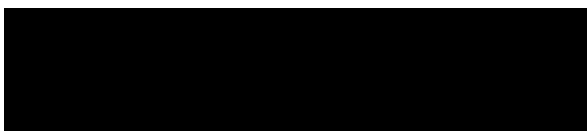
February 2021

Land at Hallow Heath: Initial Landscape and Visual Appraisal

Prepared on behalf of IM Land Limited

Project Ref:	31066
Status:	Final
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Date:	February 2021
Prepared by:	DD
Checked by:	PC
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ILLUSTRATIVE MATERIAL

Figure 1: Landscape and Visual Appraisal Plan

Figure 2: Topography Plan

Figure 3: Landscape Character Plan

Figure 4: Landscape and Visual Opportunities and Constraints Plan (tbc)

Site Photographs 1-8

1.0 INTRODUCTION

- 1.1 Barton Willmore LLP's specialist Landscape Planning and Design team (BW) were instructed by IM Land Ltd in February 2021 to provide initial landscape and visual advice on the potential for residential development ('the Proposed Development') of land west of the A443 at Hallow Heath, which forms the northern neighbourhood of the settlement of Hallow, Worcestershire ('the Site').
- 1.2 This document represents a summary of Barton Willmore's initial landscape and visual appraisal (LVA) to inform the Proposed Development and should be read in combination with the figures and photographic material. The initial Landscape and Visual Appraisal site visit was undertaken in February 2021. The panoramic photographs included in the representative Site Photographs pack are not intended as a comprehensive site or visual appraisal record but, at this initial stage, provide an overview illustration of the character of the Site and its vicinity, as well as the nature of key representative views towards the Site from the surrounding area.
- 1.3 The LVA considers in brief the Site's physical context; relevant character assessments and policies; the features and character of the Site and view towards it; and landscape and visual opportunities and constraints to built development.

2.0 SUMMARY LANDSCAPE AND VISUAL APPRAISAL

Site Location

- 2.1 As shown on **Figure 1**, the Site is located at the northern edge of Hallow, Worcestershire approximately 250 metres (m) from the junction of Moseley Road and the A443. The Site is bounded by open fields to the north, the settlement of Hallow to the immediate south, Moseley Road and associated ribbon development to the west and the A443 to the east. The Site lies within the administrative boundary of Malvern Hills District Council and Hallow Parish Council.

Topography

- 2.2 As shown in **Figure 2**, the dominant topographical features in the vicinity of the Site are the valleys of the River Severn to the east, which lies at approximately 15m Above Ordnance Datum (AOD) and the Laughern Brook to the west, which lies at approximately 30-35m AOD. The elevated land in between these valleys forms a plateau at an elevation of approximately 45m AOD. The plateau broadens to the north, extending as far as Windy Ridge to the north-east and Clay Hill to the west.
- 2.3 A watershed extending north-east - south-west is present in the vicinity of Flatten Bank Cottage, west of the Site. From this point, land drains to the north-east across the north-western edge of the Site towards the River Severn; and to the south towards Laughern Brook.
- 2.4 Numerous valleys and intervening plateaux create a gently undulating landform pattern in the wider landscape to the west of the River Severn.

Land Use and Settlement

- 2.5 The topographical pattern has dictated the settlement pattern and land use in this area. The A443 Worcester-Tenbury Road which flanks the Site to the east, follows the north-south ridge and Hallow extends along this route across the plateau. Typically, development in Hallow is situated on the plateau at approximately 45m AOD, although development has extended onto lower slopes where side valleys cut into the plateau, such as at Church Lane, Shoulton Lane and along Moseley Road across the watershed west of the Site.
- 2.6 Throughout most of the settlement, the linear pattern along the A443 and Moseley Road to the north-west is extended laterally by side lanes serving areas of development expanding across the plateau. This is particularly evident in the part of Hallow where the Site is located, known as Hallow Heath, including 20th century residential development on Oakleigh Heath to the west; and Coppice Close to the east. The land to the south of the Site, between Moseley Road and the A443, is subject to recent infill at Old Hopyard Close, creating an expanse of continuous

development across the plateau in this area. In other parts of the settlement, to the south, there are extents where development only extends one side or other of the A443 corridor, creating extents of development fronting onto open landscape opposite. This arrangement, in conjunction with the protruding extents of development situated around the settlement (see **Figures 1 and 2**), creates an irregular settlement morphology either side of the central spine.

- 2.7 The junction of Moseley Road and the A443 is an important nodal point in the settlement, at which is located a small shop and post office. The junction is lent additional legibility by the presence of adjacent 2.5 storey development in-between the fork of the two roadways. Development flanking Moseley Road to the west of the Site comprises a distinctive linear pattern of detached properties in gardens, extending as far as a further cluster at the turning to Moseley, known as World's End. The Hallow settlement entrance is marked by signage to the north-west of this cluster, approximately 520m north-west of the Site. From this point to the southern extent of the settlement of Hallow is approximately 2.3km.
- 2.8 Land use in the wider context is generally open agricultural fields, within which smaller settlements and occasional outlying farmsteads and residential properties are situated.

Vegetation

- 2.9 In the immediate vicinity of the Site, the vegetation pattern comprises hedgerow field boundaries with occasional hedgerow trees and linear belts of woodland. Standalone trees within the fields are also characteristic of this area.
- 2.10 A linear tree belt to the north of the Site stretches along a side valley from the A443 to Moseley Road. This vegetation forms the southern boundary of the Thorngrove estate, within which parkland vegetation of open landscape with field trees is present. A number of woodlands extend along the western flanks of the Severn valley, including Tinker's Coppice, to the north-east of the Site.
- 2.11 Smaller clumps and belts of woodland are evident amid the field pattern, as well as in the vicinity of Heath Farm on Moseley Road, providing a gateway for the main part of the settlement on this route. The settlement edge of Hallow in the vicinity of the Site is otherwise lacking in vegetation which results in a strong edge of 20th century built form to the wider landscape, notably to the east of the Site adjoining the A443 and at at Coppice Close; but also to the west, at Oakleigh Heath. In other, longer established parts of the settlement, notably around the green and Church Lane in the southern part of the settlement, lines and small blocks of canopy vegetation are present, resulting in a softer, more wooded edge.

Designations

- 2.12 There are no designations for landscape quality of value within the Site or in its immediate vicinity.
- 2.13 There are no heritage assets within the Site, the nearest are the Grade II listed 'Thorngrove Lodge' and 'Bridge in Grounds of Thorngrove', lying approximately 405m to the north-east and 420m to the north respectively. Although not listed, Heath Farm on Moseley Road is nominated to be considered as a locally listed building as part of the Hallow Neighbourhood Plan. The main farm building lies approximately 50m to the west of the southern boundary and a distinctive collection of barns are located to the north of the farmhouse, now seemingly in residential use. A Conservation Area is located in the southern part of the settlement.
- 2.14 Public Right of Way (PRoW) 539(C) extends across the Site in a broadly north-south alignment. This PRoW joins several other PRoWs to the north including PRoW 528 (C) which runs along the edge of the woodland at Thorngrove, approximately 190m to the north of the Site.
- 2.15 The development boundary shown on the Malvern District Council (South Worcestershire) Local Plan Proposals Map excludes the Site but does not reflect the current extent of built development in this part of Hallow in any case, by excluding development at Coppice Close, Old Hopyard Close, Heath Farm and the extent of development as far as the settlement edge, north-west along Moseley Road approximately 800m to the north-west of the development boundary.

Landscape Character

- 2.16 The vicinity of the Site has been subject to published assessment at national, county and settlement level. In this initial Landscape and Visual Appraisal, focus has been given to the more localised assessments at county and settlement level, the extents of which are shown on **Figure 3**.

Worcestershire Landscape Character Assessment (2012)

- 2.17 Worcestershire County Council (WCC) published the Worcestershire Landscape Character Assessment (WLCA) in 2012 as a Supplementary Planning Guidance. The WLCA categorises the County into twenty-two Landscape Character Types (LTs) which are made further area-specific by breaking these LTs down into Landscape Description Units (LDUs). The Site and its surroundings lie within LT 'Principal Timbered Farmlands' and LDU MW54 'Hallow Principal Timbered Farmlands'

LT 'Principal Timbered Farmlands'

2.18 This LT is described as

"...rolling lowland landscapes with occasional steep sided hills and low escarpments. They have a small scale, wooded, agricultural appearance characterised by filtered views through densely scattered hedgerow trees."

2.19 Key characteristics of the LT 'Principal Timbered Farmlands' include:

"Primary

- *Notable pattern of hedgerow trees, predominantly oak*
- *Hedgerow boundaries to fields*
- *Ancient wooded character*

Secondary

- *Organic enclosure pattern*
- *Small-scale landscape, hedgerow trees creating filtered views*
- *Brick and timber building style of old properties*
- *Rolling lowland with occasional steep sided hills and low escarpments*

Tertiary

- *Mixed farming land use*
- *Dispersed settlement pattern"*

2.20 The assessment further notes that:

"The key element of these landscapes is the strong unifying presence of tree cover in the guise of woodlands, hedgerow trees, and linear tree cover associated with streams and watercourses, the combined presence of these tree cover components providing the essential sense of scale and enclosure, and creating the filtered views that are distinctive in this landscape. The resulting woodland character is essentially that of mixed native broadleaves, with oak the dominant species, lines of mature oak being a particular feature of the hedgerows as befits a landscape with strong links to its woodland origins..."

2.21 Landscape guidelines for LT 'Principal Timbered Farmlands' include:

- *"maintain the tree cover character of hedgerow oaks, and enhance the age structure of the hedgerow oak population*
..."

- *encourage the planting of new woodlands, reflecting the scale, shape and composition of the existing ancient woodland character, favouring oak as the major species.*
- *conserve and restore tree cover along water courses and streamlines*
- *seek opportunities to enhance tree cover along highways and other non-farmed locations*
- *conserve and restore the pattern and composition of the hedgerow structure through appropriate management, and replanting*
- *conserve the organic pattern and character of the lane networks*
- *maintain the historic dispersed settlement pattern"*

2.22 In relation to the characteristics set out in this assessment, the Site lies on gently undulating agricultural land with strong hedgerow boundaries featuring oak trees typical of this LCT. Hallow is not a dispersed settlement but forms a substantial contiguous extent of linear, side extension and infill settlement pattern.

LDU MW54 'Hallow Principal Timbered Farmlands'

2.23 LDU MW54 is described as:

"...a rolling lowland topography. It is an area of mixed farming with a settlement pattern of farmsteads and strings of wayside dwellings, associated with a medium to high level of dispersal, and a small to medium scale field pattern. The tree cover is defined by scattered hedgerow and streamside trees together with groups of trees associated with settlements."

2.24 The LDU further records:

- "...
- *localised high impact of urban development*
 - *localised high impact of modern ribbon residential development*
- ..."

2.25 In relation to the characteristics set out in this assessment, the Site is formed of agricultural fields and also includes farm buildings. The Site itself is devoid of any ribbon development, however it adjoins the ribbon development along Moseley Road. Hedgerows form the field boundaries on the Site with occasional hedgerow trees. Modern residential development is characteristic of the northern part of Hallow and various types of development have a strong influence over the adjacent landscape to the north.

Hallow Design Guide (2019)

2.26 At a local level, Hallow Design Guide (HDG) was prepared by AECOM on behalf of Hallow Parish Council in June 2019 as part of the supporting documents for the Hallow Neighbourhood

Development Plan. The HDG identifies six distinct landscape character areas (LCAs). The majority of the Site lies within LCA06: Shoulton Farming Hamlet, whilst the southern extent of the Site lies within LCA 04: Hallow Village.

LCA04: Hallow Village

2.27 The Settlement Pattern characteristics for LCA 04 include:

- ***"A443 follows the north-south ridge line and is the main throughfare for the village with ribbon development along it and cul de sacs off it.***
- ***Additional settlement follows undulating country lanes off the A443 to Shoulton and Moseley.***
- ***... "***

2.28 In terms of Green Spaces, Public Realm and Streetscape the document states that:

- ***"Properties are set in gardens which are mostly generous. Where there are front gardens they make a positive contribution to the streetscape.***
- ***There is no street lighting through the village other than small lighting structures within new development.***
- ***Highly vegetated front gardens create a rural feel through the village with large vegetation that blends into the surrounding landscape, by screening buildings and unsightly features such as bins storage.***
- ***... "***
- ***Small area of tree-planted green space between the A443 and Heath Close."***

2.29 In relation to Pattern and Layout of Buildings, the document notes that:

- ***"There are numerous private drives and footpaths giving access to development concealed behind buildings which border the road.***
- ***Linear development continues beyond the settlement boundary along Moseley Road. These buildings face onto the road.***
- ***Some developments have views of the countryside, but some properties screen others from this view.***
- ***The buildings are a mixture of detached and semi-detached properties. These include bungalows, houses and maisonettes.***
- ***Heath Close and Coppice Close are planned post-war developments with regular spaced, uniform houses.***
- ***The new developments at Hayfield and Heath Farm offer housing with staggered access."***

2.30 With regard to Views and Landmarks, the document does not show any views of the Site.

2.31 In terms of Building Heights, the document notes that:

- *"The majority of buildings are two storeys, with occasional three storey buildings. There are a significant number of bungalows, built in the 1960s and 1970s.*
- *Some three storey properties are old townhouses in a style typical of Worcestershire.*
- *Some properties have decorative features such as brick chimneys, porches and bay windows.*
- *Roof lines are staggered in some developments to break the visual line of the roofs across the skyline."*

2.32 The HDG further outlines the positive aspects of character for LCA 04 and states that:

- *"The surviving historic buildings make a positive contribution to the character of the area.*
- *Boundary hedges and walls help to define the structure of the village.*
- *Spacious plots along the A433 with most of the properties set back from the road, behind front gardens.*
- *Views to the surrounding countryside contribute to the character of the area.*
- *Views of the spire of the Church of St Philip and St James contribute to a sense of place.*
- *The School with its bell tower and distinctive Gothic style makes a positive contribution to the area.*
- *Clear distinction between the village and countryside beyond."*

LCA06: Shoulton Farming Hamlet

2.33 Note: LCA06 is named as 'Moseley/Shoulton Farmlands' on Figure 3 of the Design Guide and is shown as such in **Figure 3** of this LVA.

2.34 The Settlement Pattern characteristics for LCA 06 include the following of relevance to the Site:

- *"... [beyond the settlement of Shoulton] The LCA is otherwise comprised of small to medium size agricultural fields, orchards and isolated farmsteads.*
- *...*
- *Several farm buildings are scattered through the LCA.*
- *...*
- *Mixture of properties from the 18th, 19th and 20th century."*

2.35 In terms of Green spaces, Public Realm and Streetscape the document notes the:

"... overall verdant character of the LCA.... "

2.36 With regard to Views and Landmarks, the document does not show any views of the Site.

2.37 In relation to Pattern and Layout of Buildings, the document notes that:

"...The majority of properties in the LCA are located on Shoulton Lane and, in the north-east, on Moseley Rd..."

2.38 With regard to Building Line and Boundary Treatment, the document notes:

"Vegetation is used to create a screen for buildings and maintain a rural feel."

2.39 In terms of Land Use, Levels of Activity and Parking, the document notes that:

"This is a sparsely populated, very low density residential area, surrounded by farmland and forestry. A narrow roads [sic] and a network of PRowS provide access, but it remains remote with high perceptions of tranquillity."

2.40 The HDG further outlines the positive aspects of character for LCA 06, noting that it has:

- ***"Strongly rural character with high perceptions of tranquillity.***
- ***Sympathetic building conversions from agricultural use to residential.***
- ***Long distant views from the elevated ridgeline.***
- ***Network of PRow facilitate access to the countryside."***

2.41 It is noted that the Site lies immediately adjacent to and includes part of the settlement edge of Hallow and is adjoined by the A443 and therefore is not perceived as particularly remote or tranquil.

Landscape Planning Policy

2.42 South Worcestershire Development Plan (Adopted February 2016) includes Policy SWDP21: Design, which emphasises the need to complement the character of the area, including the distinct identity and character of settlements.

2.43 Policy SWDP 25: Landscape Character, notes the need to consider the latest landscape character assessment; integrate appropriately with the landscape setting and protect and conserve key landscape features and attributes; and where appropriate, enhance landscape quality.

2.44 Policy SWDP 5: Green Infrastructure, requires new housing development to contribute towards the provision, maintenance, improvement and connectivity of Green Infrastructure (GI). The Site is listed as 'protect and enhance' under GI attributes and the policy notes that proposals that would be detrimental to the important GI attributes in this area would not be permitted with a couple of exceptions.

2.45 Worcestershire Green Infrastructure Strategy 2013-2018 notes within para 5.15 that:

"GI provision in residential developments can be varied and can include informal space, footpaths, bridleways, cycleways, SuDS, natural habitats and street trees. GI can also include gardens which are the responsibility of individual owners but can contribute to ecological networks if managed appropriately."

2.46 The GI Strategy categorises the county into several Environment Character Areas (ECAs). The Site lies within ECA 1: Teme Valley and Wyre Forest. Appendix D notes the overarching environment principles for this area includes:

- **"Enhance stream and river corridors.**
- **Protect ancient countryside character.**
- **"Enhance and expand acid grassland habitats."**

2.47 Appendix E notes that this area is of 'High' natural environment quality, however as an overall approach it states **"Average: Protect and enhance environmental quality / invest in socio-economic enhancements"**.

2.48 In the Hallow Neighbourhood Development Plan (NDP) 2020-2041 Regulation 16 draft, published in December 2020, Draft Policy HAL3: Housing Design, states that new development should retain and enhance the existing defining characters of Hallow and the surrounding countryside, including the recommendations within the Hallow Design Guide.

2.49 Draft Policy HAL4: Landscape, requires new development to protect or enhance the local landscape. It further notes that developments need to demonstrate that they have taken into account:

- a) **"Impact on the form, pattern, relationship, and character of the neighbourhood area's separate and distinct settlements.**
- b) **Respect for field systems and other historic boundaries.**
- c) **The relationship of buildings to key features in the landscape, such as, but not limited to, routeways, hedgerows, trees, water features and watercourses; and**
- d) **Where landscaping is used, new planting (e.g., of trees, hedgerows, and other vegetation) should be of native species, compatible with the surrounding landscape. Where considered necessary (e.g., larger areas of landscaping or publicly accessible landscaping areas) such proposals should be accompanied by a plan setting out proposals for their long-term management and maintenance."**

2.50 Draft Policy HAL7: Important Views, states that development proposals must demonstrate that:

"...they are sited, designed and of a scale such that they do not substantially harm the important views ... when seen from locations that are freely accessible to members of the general public".

2.51 Of the listed views, only View 18 - SW where path 528c meets Main Rd is of relevance to the Site. Key characteristics of the view are:

- Landmark buildings: Heath Farm; Rural houses along Moseley Rd.
- Landscape features: Hills framing rural edge of village. Pastoral fields.
- Boundaries Main Rd hedge to L foreground, Thorngrove to R. Malvern and Ankerdine Hills in background.
- What makes this view special: Iconic view of north end of village; distant views of hills, attractive rural housing. Open gap between village and Thorngrove Estate gives distinctive character to village.

2.52 The Site is covered by Draft Policy HAL8: Green Infrastructure, which states that:

"Development proposals that impact on Hallow's Green Infrastructure Network ... should demonstrate how new development:

a) Maintains Hallow's green infrastructure network, including key features such as the:

- i) Ecological, historic and landscape character functions of natural habitats.***
- ii) Drainage and ecological value of the network of watercourses and features; and***
- iii) The recreational function of existing publicly accessible green space, including footpaths, bridleways, public rights of way.***

b) Responds to opportunities to incorporate new green infrastructure provision and/or restore existing green infrastructure that would otherwise be lost, as part of development proposals.

Consideration should also be given to the incorporation of connections and links to the surrounding network of existing green infrastructure, where relevant.

Development that would disrupt or sever the existing green infrastructure network will not be supported.

Where new green infrastructure is created as part of a development proposal this should be accompanied by a management plan (secured by a condition) setting out how the resource will be managed and maintained."

Site Appraisal

- 2.53 The Site is illustrated on **Figure 1** and features in Site Photographs 1-8, which are taken from the Site and surrounding area, at locations shown on **Figure 1**. The Site comprises approximately 13.7 ha situated on the transition in landform between the plateau of Hallow to the south and a side valley of the River Severn to the north. The eastern, southern and south-western extents of the Site are located on the plateau landform occupied by the majority of Hallow at approximately 45m AOD. The central and north-western areas of the Site fall to approximately 40m AOD, creating a distinctive pattern of landform descending to the north and providing a distinct structural separation between the settlement and the woodland belt forming the edge of Thorngrove Estate. The outbuildings of Heath Farm descend into the valley head in the centre of the Site, following a pattern of development falling onto the slopes of side valleys seen elsewhere in the settlement. A pattern of hedgerows is evident across the Site as well as a number of specimen oak canopy trees, visible in **Site Photograph 7**, which also demonstrates the distinctive falling landform to the north-west.
- 2.54 The supporting documents for the Hallow Neighbourhood Development Plan include 'Significant Trees Folder and Map', trees 8c, 8d and 8e are within the western extent of the Site or adjoining the Site's boundary. These three trees are part of a group of 'marker oaks'.
- 2.55 The Site includes the modern farm buildings of Heath Farm, also visible on the right hand side of **Site Photograph 7**. To the right of these buildings in the photograph a distinctive former farm outbuilding can be seen, now in residential use, which forms a strong focal point at the shallow head of the side valley extending through the Site.

Visual Appraisal

- 2.56 As described in the Hallow Design Guide, there are no views of the Site from locations in the settlement where intervening built form curtails them, to the south of Heath Farm and Coppice Close, for example. Views of these features and other built forms as the edge of the settlement on the plateau are obtained from the approach along the A443 (**Site Photographs 1-3**). The built forms provide a stark horizon, notably to the east of the roadway at Coppice Close, for lack of any vegetation to soften and integrate them; and because they are arranged as a continuous frontage, with no variation to break up the regularity and create a perception of a more gentle edge. Further to the west, in the vicinity of Heath Farm, built form is better integrated into the landscape by canopy trees. Tinker's Coppice Farm is a modern building, the access drive to which is marked by a line of non-native poplar trees. This provides a northern extension of the influence of the stark 20th century settlement edge across the plateau (**Site Photograph 2**).

- 2.57 From PROW 528C to the north, topography plays a key role in varying visibility of the Site and the existing settlement edge beyond, as the viewer moves along the PROW route. This varies from no visibility, owing to intervening landform, to glimpses of the rooflines of existing development (**Site Photographs 4 and 5**) and more open views of the Site and settlement edge further to the east, from along PROW 530C as it rises towards Moseley Road (**Site Photograph 6**). In the latter view the prominent influence of modern development at Coppice Close and Tinker's Coppice Farm can be clearly seen on the plateau, contrasting with the more rural character of landscape falling to the left hand side towards Thorngrove estate. This is typical of the limited number of views obtained towards the Site from the wider landscape to the north-west, including from the settlement entrance on Moseley Road at World's End; and from PROW extending south from Sinton Green.
- 2.58 From further to the west, in the vicinity of a noted Hallow Design Guide/Draft Neighbourhood Plan Important View at the junction of PROW 572B with a number of other PROW, the Site can barely be seen beyond residential development along Moseley Road (**Site Photograph 8**). This distinctive, low-density ribbon development can be seen from most locations around the area from where the Site is visible and form a context of rural built form extending from the settlement and which, like other development in the main part of the settlement to the south-east, is also prominent on the skyline in certain views.

3.0 CONCLUSION: LANDSCAPE AND VISUAL OPPORTUNITIES AND CONSTRAINTS

- 3.1 On the basis of this analysis of the landscape and visual baseline, it is concluded that there is potential for sensitive residential and open space development of the Site, subject to a number of opportunities and constraints and strategic design principles. These are illustrated on **Figure 4** and set out below.
- 3.2 The settlement pattern of Hallow is one of development on the plateau and the upper extents of adjoining slopes. This pattern in relation to topography forms part of the distinct identity and character of the settlement. There is potential within the Site to provide a natural extension of the settlement pattern along the plateau at approximately 45m AOD, with potential for some extension onto the upper adjoining slopes, notably at the valley landform in the centre of the Site, as built forms at Heath Farm do currently. The side valley extending out of the north-western part of the Site forms a natural edge to the plateau settlement in this vicinity although the development should respect existing hedgerow boundaries where these would provide containment within the plateau extent.
- 3.3 The extension across the plateau would notably be feasible flanking the A443 and would not be out of character with the settlement, which has extended along the roadway through its evolution, including at points along only one side of the road and overall creates an irregular morphology. Development at the northern extent of this part of the Site should be set back from the plateau edge and should not be arranged as a regular and continuous built frontage, to avoid a dominant built form at the settlement edge, as is already seen to the east of the Site, which is an example of the localised high impact of development set out in published character assessment. The Proposed Development around the edge to the wider landscape, whilst providing positive built frontages, should seek to create a more informal and fragmented edge.
- 3.4 There would also be potential for a more sensitive edge-of-settlement treatment flanking the roadway than either the stark frontage in the vicinity of Coppice Close or the uncharacteristic line of poplar trees adjoining the outlying modern structure of Tinker's Coppice Farm. This could take the form of a small-scale woodland copse formed of native oak trees, as a settlement gateway.
- 3.5 There would furthermore be potential to enhance tree cover along the A443, adjoining the Site, in accordance with published character guidance, with potential to use locally-characteristic oak hedgerow trees.

- 3.6 This softening of the settlement edge should continue around the north-western edge of the proposed development area in the form of retention of existing field trees and planting of clumps of further specimen oak trees amid a rural parkland landscape on the slopes to provide characteristic wooded cover, scale and enclosure; as well as filtered views, softening the settlement edge and enhancing the age structure of specimen oak canopy trees, all in line with published character guidance. Groups of trees are characteristic associated with settlements in this area, as set out in published character assessment. In views from the north and north-west, this softening of the settlement edge would integrate the built form naturally into the landscape. Open views of built form in the vicinity of the Site are currently obtained across this area, notably from the north-west and, whilst in the context of the existing settlement the Proposed Development would slightly increase the extent of built form visible, this would not be further than the existing modern development at Tinker's Coppice Farm and would not be perceived as an incongruous extension of the settlement.
- 3.7 There is potential for a limited parcel of development flanking Moseley Road, on the western area of plateau within the Site, albeit this would need to respect the low density of the linear pattern of detached built form along the roadway and would need to accommodate the existing outward view to the north obtained from the PROW extending through this part of the Site. There would also need to be a strong landscape structure along the hedgerow to diminish any perception of increased density in relation to adjoining properties to the north-west.
- 3.8 These two principal areas of development could be linked by a limited area of development extending into the head of the valley in the centre of the Site, adjoining buildings at Heath Farm, albeit maintaining the focal feature of the former barn which lies at the head of the valley.
- 3.9 There is substantial potential for multi-functional and locally-distinctive Green Infrastructure to provide a positive and accessible settlement edge landscape. Beyond the parkland slopes, this would include an area of wetland character on the valley floor extending north-east from the Site, including sustainable drainage (SuDS) basins or ponds, enhancing the legibility of the topography and providing increased biodiversity opportunity and visual interest.
- 3.10 In relation to Draft NDP Policy HAL3: Housing Design, the Proposed Development would take as its fundamental guiding structure the topographic variation which forms the defining plateau setting of Hallow and marks the transition to the wider landscape as slopes fall away beyond the plateau. Thus, built form could be set appropriately in the landscape in a locally distinctive pattern. Aside from the locally-distinctive strategic landscape design approaches proposed, there is also potential for built form responsive to local built character, which would provide reinforcement of sense of place and local identity.

- 3.11 In relation to Draft NDP Policy HAL4: Landscape, the Proposed Development would respect the form and pattern of the settlement in this vicinity, by observing the distinctive relationship of the settlement with landform. The Proposed Development would also respect field boundaries and existing trees. Proposed structural planting would be of native species and designed to complement the existing landscape.
- 3.12 In relation to Draft NDP Policy HAL7: Important View 18, the Proposed Development would maintain views from the north-east of rural houses along Mosely Road although it would largely screen Heath Farm, the most visible modern barn elements of which are included within the land in the Site promoted for development in any event. The views of the rolling landscape forming the edge of the plateau on which the settlement is set would be maintained, as would views to distant hills to the west and south-west. There is potential for a locally-distinctive design approach to the proposed housing which would maintain (albeit foreshorten) and potentially enhance the perception of attractive rural housing, notably when compared to the non-descript and stark frontages of Coppice Close at the north-eastern settlement edge. The identified open gap between the village and Thorngrove Estate, in the legible form of landscape falling from the plateau on which the settlement is set (assumed to be the 'hills framing rural edge of village'), would be maintained as a distinctive aspect of the character of the settlement. The criteria for the Important View do not reference views from the roadway closer to the settlement.
- 3.13 In relation to Draft NDP Policy HAL8: Green Infrastructure, the Proposed Development would maintain and enhance functionality of Green Infrastructure, including a sensitive and logical response to the character of the settlement edge and topography in this vicinity; provide enhanced drainage and biodiversity opportunity to the north-east of the local watershed; and provide enhanced recreational opportunity in the form of a substantial area of public open space, well-connected to the surrounding network of Green Infrastructure. Currently the function of Green Infrastructure at the Site is limited largely to landscape character and footpath provision.
- 3.14 It is therefore considered that in landscape and visual terms there is potential for a sensitive development of the Site, that would be a logical extension of the existing settlement, taking due regard for its distinctive topographic setting; would minimise harm to landscape character and views and have potential to provide a more locally-characteristic settlement edge than that to the east of the Site; and would provide potential for extensive locally-characteristic and multi-functional green infrastructure.