

Mr David Clarke  
Planning Policy at Malvern Hills District Council  
Planning Services,  
The Council House,  
Avenue Road,  
Malvern  
WR14 3AF

24<sup>th</sup> February 2020

Dear Mr Clarke

**RE: Hallow Neighbourhood Plan - Regulation 16 Consultation**

Worcestershire County Council welcomes the opportunity to comment on the above consultation.

If you would like to discuss any of these comments please do not hesitate to contact Natasha Friend (email:

████████████████████ in the first instance.

Yours Sincerely,

*Emily Barker*

**Emily Barker**  
**Planning Services**  
**Manager**

Business,  
Environment and  
Community  
County Hall  
Spetchley Road  
Worcester  
WR5 2NP

Planning Services Manager

## Transport Policy

Please note all development should adhere guidelines set out in the Worcestershire Streetscape Design Guide. Furthermore, all new community facilities should be accessible by walking / cycling and have pedestrian links from key residential areas with all new employment sites should including cycle parking (see Worcestershire Streetscape Design Guide for details). Finally Worcestershire County Council fully supports reducing the need for single occupancy car use. We support giving residents the option for active travel by providing pedestrian and cycle links to local amenities, including the school, and to the city of Worcester.

## Worcestershire Children First

Worcestershire Children First are happy to confirm they have no further comments to make.

## Sustainability Team

### Energy

To reiterate our comments from the Regulation 14 response, it would be encouraging to see more recognition of the issues of energy efficiency, fuel poverty and greenhouse gas emissions within the Neighbourhood Plan.

The Design Guide does include the following general design principles, which we are supportive of:

- *Sensitively integrate energy efficient technologies within the scheme at the start of the design process*
- *Is the use of energy saving/efficient technologies encouraged and maximised? Are these technologies integrated into the proposal and not 'bolt on'?*
- *Has the lighting scheme been designed to avoid light pollution?*
- *Solar panels should be encouraged amongst development for environmental purposes*

However, the Plan could have promoted further consideration to supporting renewable energy (other than solar PV) through the Design Guide. The plan could have also requested that energy efficiency of new homes goes beyond the standards required in building regulations which would be in line with the National Planning Policy Framework. Improving the energy efficiency standards of new homes will help to support achievement of net zero carbon targets and reduce the risk of fuel poverty for new residents. There are opportunities to link zero carbon building design into Policy HAL3 – Housing Design.

The latest figures show that c.10% of households in Worcestershire are considered to be fuel poor, meaning they have high energy costs but a low household income.

Fully supportive of Policy HAL5 – *Dark Skies – to reduce unnecessary lighting can also help to reduce greenhouse gas emissions.*

### **Ultra Low Emissions Vehicles (ULEV)**

The Plan does not refer to future electric vehicle infrastructure. We would welcome consideration of the inclusion of/support for electric vehicle charging points in new developments. The Road to Zero strategy produced by the UK Government outlined the intention to consult on proposals for all new UK homes to have an electric vehicle charge point where appropriate. This consultation concluded October 2019 – currently awaiting response from Government. The Government will end the sale of new petrol and diesel cars and vans by 2030, so any new development needs to have the charging infrastructure in place for the expected increase in EV ownership.

Policy HAL15 seeks to reduce private vehicle use, however could this policy include support for low emission vehicles, such as electric cars, due to the beneficial air quality impacts?

### **Water Efficiency**

The Plan could consider improvements to water efficiency in new homes, including the provision of water butts.

### **Climate Change**

Climate change mitigation and adaptation are central to the National Planning Policy Framework (NPPF). The UK Climate Change Act 2008 sets legally binding targets for the UK to reduce carbon emissions to net zero by 2050. New developments will be around for a considerable number of years, it is important that they remain fit for purpose over their lifetime as the climate changes. The Plan and Design Guide could consider actions to improve local resilience to climate change, such as wider guttering, green roofs, permeable paving etc.

There is very limited reference to climate change – adaptation or mitigation, within the Plan aside from the following statement on page 102:

*‘To promote active, healthy lifestyles, a safer environment and reduce congestion and vehicle emissions, thereby improving air quality and reducing climate change impacts’;*

And also this statement in the appended Design Guide:

*‘Native trees and shrubs should generally be used to reinforce the rural character of the village. Non-native species may also be appropriate to increase resilience to the effects of climate change and pests and diseases’.*

### **Waste, Composting & Food Growing**

Fully supportive of the General Design Principles to: *Make enough provision for sustainable waste management (including facilities for kerbside collection, waste*

*separation and minimisation where appropriate) without adverse impact on the street scene, the local landscape or the amenities of neighbours.*

The Plan could also consider options for onsite composting for new homes, including provision of compost bins for all new homes.

Fully supportive of the proposal under Policy HAL3 to encourage ‘*environments that promote social interaction, physical activity and opportunities for food growing*’.

### **Low Carbon Neighbourhood Planning Guidance**

For further guidance related to low carbon neighbourhood planning:

<https://www.cse.org.uk/downloads/reports-and-publications/policy/planning/renewables/neighbourhood-planning-in-a-climate-emergency-feb-2020.pdf>