

Hallow Neighbourhood Development Plan 2020 - 2041

Consultation Statement

December 2020

Hallow Parish Council

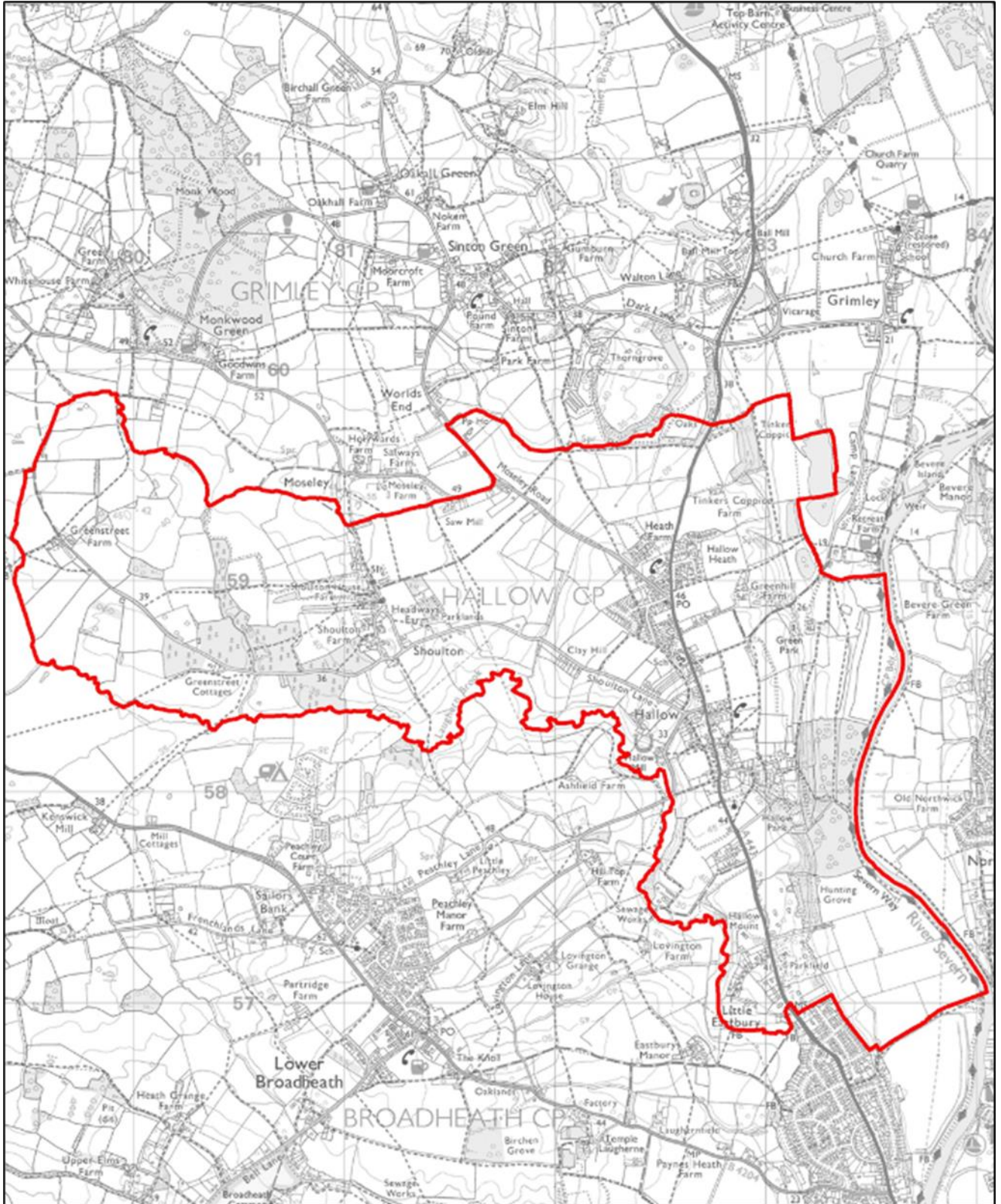
With assistance from



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Map 1 Hallow Designated Neighbourhood Plan Area (© Crown copyright and database rights [2020] Ordnance Survey 100055940 Hallow Parish Council (Licensee) License number 100050758)



1.0 Introduction and Background

1.1 This Consultation Statement has been prepared in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Paragraph 15 (2)¹ which defines a “consultation statement” as *a document which –*

(a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;

(b) explains how they were consulted;

(c) summarises the main issues and concerns raised by the persons consulted; and

(d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

1.2 The Hallow Neighbourhood Development Plan (HNDP) has also been prepared by taking into account the advice provided in Paragraph: 107 (Reference ID: 41-107-20200925) of the National Planning Practice (NPPG).

1.3 The Hallow Neighbourhood Development Plan has been prepared in response to the Localism Act 2011, this gives parish councils and other relevant bodies, new powers to prepare statutory Neighbourhood Plans to help guide development in their local areas. These powers give local people the opportunity to shape new development, as planning applications are determined in accordance with national planning policy and the local development plan, and neighbourhood plans form part of this framework.

1.3 The Parish Council applied for area designation on and the area shown on Map 1 was designated as a neighbourhood area by Malvern Hills District Council on 14th July 2017.

1.4 The NDP has been prepared by a Neighbourhood Development Plan Steering Group (NDPSG) of local residents and parish councillors on behalf of the Parish Council. NDPSG meetings are publicised on the Parish Council website <https://www.hallowpc.co.uk/copy-of-minutes> the village email circulation and the parish magazine.

1.5 All information about the HNDP at each stage has been provided on the parish council web site on the HNDP web link:

<https://www.hallowpc.co.uk/neighbourhood-development-plan>

¹ <http://www.legislation.gov.uk/uksi/2012/637/contents/made>

1.6 The HNDP has been the subject of a wide and comprehensive range of consultation activity, this is summarised in Table 1. This Statement provides further information and evidence to demonstrate how the HNDP meets the Neighbourhood Planning Regulations.

Date	Activity
March/April 2017 – Focus Groups	Three focus groups were held with a wide range of residents to establish key issues for Hallow and the level of support for Hallow preparing a Neighbourhood Development Plan. The focus groups also assisted in recruiting a cross section of residents for the HNDP Steering Group.
April 2017 – Public Meeting	NDP presentation to village and Hallow Parish Council (HPC) by NDP Lead Officer from Malvern Hills District Council.
June 2017 – Parish Council meeting	HPC agree to commence preparation of an NDP.
November 2017 – Walkabout	A Parish Walkabout to survey the built environment using the ‘My Place Matters Toolkit’ by 26 volunteers from across the village, with the assistance of Hallow History Group.
February- March 2018 – Public Information Events	Five Public Information Events on key issues to establish general village views and to establish key areas for the community questionnaire to cover, with a total of 228 villagers attending.
April 2018 - Walkabout	Second Parish Walkabout to survey important views and local green spaces (using NPPF criteria), by 24 volunteers from across the village.
June 2018 – Community Survey	Community Survey with 390 completed responses out of 558 delivered or requested. Forms completed per household, for those aged 16 or over, representing a 63% completion rate.
June 2018 - Business Survey	43 businesses contacted, including farms, retail outlets, and a wide range of commercial and community services. A total of 15 responses were received, representing a 35% completion rate.
June 2018- Hallow Country Fayre.	Stall at Hallow Country Fayre, June 2018.
September-October 2018 - Public Information Events	Four Public Information Events on results of surveys and draft vision and policies published with a total of 111 residents attending.
October 2018 – Young people’s focus group	Focus group with young people aged between 8 and 13, Hallow Scout Hut.
Autumn 2018- Hallow C of E Primary School	Classroom discussion Hallow C of E Primary School, autumn term, 2018.
May 2019 Annual Parish Meeting	Presentation to Annual Parish Meeting.
October/November 2019	Consultation on housing site options.

Date	Activity
June/August 2020	Regulation 14 consultation

2.0 Pre-Regulation 14 Consultation 2017-2020

Focus Groups (March/April 2017)

- 2.1 To kick-start the NDP preparations the Parish Council held three focus group meetings in March/April 2017 with a wide range of residents to establish key issues for Hallow and the level of support for Hallow preparing a Neighbourhood Development Plan. The focus groups also assisted in recruiting a cross section of residents for the HNPD Steering Group.

Public Meeting (April 2017)

- 2.2 In April 2017 a public meeting was held to raise awareness about neighbourhood planning and the process involved, the NDP Lead Officer from Malvern Hills District Council attended and gave a presentation to the Parish Council and residents.

Built Environment and Historical Assets Walkabout (November 2017)

- 2.3 On the 4th November 2017 a group of 26 volunteers were briefed by Stuart Cumella from Martley Parish Council and in small groups completed the “Your Place Matters” survey methodology (https://www.worcestershire.gov.uk/info/20230/archive_and_archaeology_projects/1064/archaeology_planning_advice/2). The purpose of this workstream was to identify the character of the village, its key buildings and historical assets. The village was divided into geographical areas and a survey form completed for each area, recording things such as key buildings and street scenes (Appendix 1). Over 200 photographs were taken providing an extensive record for the Hallow History Group as well as background evidence for use by those preparing the NDP.



Walkabout 2017

Public Information Events (February/March 2018)

- 2.4 Five Public Information Events on key issues to establish general village views and to establish key areas for the community questionnaire to cover, with a total of 228 villagers attending.



Public Information Event

Community Survey (June 2018)

- 2.5 To gain a more comprehensive overview of resident's aspirations and concerns a Community Survey was undertaken. In total, 558 survey forms were delivered or requested by households. 390 completed returns were received a response rate of over 63%, very good for a survey of this kind. The full survey report is

available at <https://hallowndp.co.uk/wp-content/uploads/2018/09/Hallow-NDP-Community-Survey-Report-Issue-1.0-FINAL.pdf>

2.6 Some of the key findings from the Community Survey were as follows:

- 78% of respondents entirely agreed with the vision statement, whilst 15% said they partly agreed.
- 73% want to retain the village boundary as it is.
- When asked about the scale of residential development in the next 12 years, around two thirds of respondents were in favour of smaller developments ('limited single plot houses' (68%) and 'small 2-4 dwelling developments' (69%)).
- The development of more sheltered accommodation was also supported by the majority of respondents.
- Respondents agreed that the type of new homes likely to be needed in the next 12 years included homes for local people, starter homes, adapted easy access homes and family homes with more than 50% agreeing.
- The majority of respondents rejected the option that 'No new homes should be built in the next 12 years'.
- A significant majority of respondents thought that new 'affordable' housing should be prioritised for people who have or had connections to the parish. The most popular criteria were 'people who live or work, or had lived or worked in the parish' (73% high priority, 17% medium priority)
- Most of the options offered in the question on housing developments were considered 'very important' or 'fairly important' by respondents. In descending order a majority thought the following options were 'very important':- 'provide off-road parking' (82%), 'design reflecting local character and local architectural features' (65%), 'maintain minimum gap consistent with existing adjacent development (65%), 'traditional forms of appearance' (54%).
- For conserving the local environment and heritage all of the options listed were thought of as important by respondents, with

more than two thirds stating, 'very important'. Including 'fairly important' this proportion was closer to nine out of ten. These options included 'historic architectural features', 'historic and listed buildings', 'heritage sites (e.g. the old churchyard)', 'historic public footpaths', 'public green spaces', 'conservation area', 'trees and woodland', 'green gaps in and around the village', 'significant gap between Hallow and Worcester City' and 'significant views within the village, looking into the village, and looking out'.

- The vast majority of respondents (four fifths or more) thought all of the landscape types listed should be protected. This includes: 'recreation areas', 'green spaces in the centre of the village', 'green spaces surrounding the village', 'woodland areas' and 'river meadows'. Green spaces in the centre of the village received the most support for protection at 96 per cent.
- 'Preserving existing woodland' was the most selected option for preserving or enhancing natural beauty, amenity, heritage and landscape assets (82 per cent), followed by 'safeguarding views over and from the village' (73 per cent). 'Enhancing natural ponds' was the least popular, but still selected by 50 per cent of respondents.
- The facilities reported as most important by respondents were the post office and Ladygo stores, with more than three quarters selecting 'very important'. Close to half also thought the playing field and parish hall were also 'very important'. The Playgroup at the Parish Hall, Sports and Social Club and Scout Hut were the least important. Pavements and public rights of way were reported as being 'very important' by around two thirds of respondents and 'fairly important' by a further fifth.
- On balance many more people agreed than disagreed that the development of all the facilities would benefit the village. A fifth of respondents or more had no opinion for all except the Parish Hall, which also had the greatest level of agreement (73%).

Development of youth facilities was also noticeable as having a high level of agreement (60%).

- With regard to local infrastructure and amenities road safety was thought of as the most urgent in need of improvement, with three quarters of respondents selecting this. The next most urgent were 'primary school provision' and 'road maintenance' selected by 53% and 45% of respondents respectively. 40% of respondents said bus services were in urgent need of improvement. Storm drainage and reducing flood risk were the least urgent and most frequently stated as not important.

Business Survey (June 2018)

2.7 In May 2018 a leaflet was distributed to businesses, notifying recipients that Hallow Parish Council was developing a Neighbourhood Development Plan, explaining the purpose of the NDP and inviting business recipients to complete an on-line questionnaire. A significant number of businesses contacted operate out of the two business parks at "Hallow Park" and "Elgar". Both were visited by leaflet droppers, and the businesses spoken to if they were available. Recipients were given 2 weeks to complete the survey on-line, with a closing date set at 30th June 2018. The completed is available at <https://hallowndp.co.uk/wp-content/uploads/2018/10/Hallow-Business-survey-1.0.pdf>.

2.8 Some 43 businesses were contacted, including farms, retail outlets, and a wide range of commercial and community services. A total of 15 responses were received, representing a healthy 35% return on those businesses directly contacted (but the responses could also include residents working from home who were alerted to the Business questionnaire via the publicised link in the Community questionnaire). Because of relatively small number of recipients and respondents to the business survey, it is not appropriate to present results as percentages. The full results are available from the link in paragraph 2.7 of this report. Comments made in response to the question what would make more businesses locate in Hallow the answers included:

1. better public transport, faster broad band.
2. More purpose-built small business units

3. Faster broadband. More reliable electrical supply. More local shops/services available.
4. Superfast fibre broadband to each set of business premises, so between the BT cabinet and the business premises
5. faster broadband
6. Cancel Brexit
7. Small units, for freehold sale.
8. Faster Broadband
9. Yes as above
10. Some purpose built, others adapt to existing building.
11. A ring road to avoid having to cross the river at either Holt or Worcester
12. Faster broadband
13. Faster broadband, parking provision

Engagement Activity (June 2018 – May -2019)

2.9 To maintain the profile of the HNDP and to continue information and evidence gathering the NDPSG held or participated in a number of engagement activities during the period June 2018 to May 2019, these included:

- Stall at Hallow Country Fayre, June 2018.
- 4 Public Information Events on results of surveys and draft vision and policies published with a total of 111 residents attending, September-October 2018.



Public Information Event

- Focus group with young people aged between 8 and 13, Hallow Scout Hut, October 2018.
- Classroom discussion Hallow C of E Primary School, autumn term, 2018.
- Presentation to Annual Parish Meeting, May 2019.

In addition, regular updates were posted to the web site and interested residents and others could subscribe to an emailing list.



Housing Site Options Consultation

Housing Site Options (October/November 2019)

- 2.10 From October to November a consultation was held on possible NDP site options (<https://hallowndp.co.uk/wp-content/uploads/2019/11/OPTION-1.pdf> and

<https://hallowndp.co.uk/wp-content/uploads/2019/11/OPTION-2-Masterplan.pdf>) and preferred NDP policies. To engage residents on this drop-in sessions were organised on the 25th, 26th, 27th, 29th and 30th of October 2019. Comments were invited at these events and via an online comment form. The 5 events were held to share with the village: draft policies; greens spaces and views; design code core features; and the site assessment and selection process including offering villagers a choice between two options. These were land south of Tinkers Coppice Farm, and Greenhill Lane extension.

2.11 117 persons attended. In terms of the two preferred options, where a choice was expressed Greenhill Lane extension was chosen at a rate of just over 2:1. Some of the comments and rationale for choice were:

1. "Extension of 33 houses to be built under SWDP 16. Therefore, houses are all in the one area."
2. "Access will be off the same point rather than 2 points along an already very busy main road."
3. "Option 1 is opposite Moseley Road which is notoriously busy."
4. "Hayfield has already designed in an access point into their 33 houses design in the front field."
5. "As the front field is already being developed a continuation would be the logical thing to do."

2.12 A number of questions were left at the events and these were answered and published in the Parish Magazine and on the Parish website and NDP websites. Only two comments were received via website form.

3.0 Regulation 14 Public Consultation June 15th to August 8th, 2020

3.1 The public consultation on the Hallow Regulation 14 Draft Neighbourhood Plan was carried out in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Pre-submission consultation and publicity, paragraph 14. This states that:

Before submitting a plan proposal to the local planning authority, a qualifying body must—

(a) publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area:

(i) details of the proposals for a neighbourhood development plan;

(ii) details of where and when the proposals for a neighbourhood development plan may be inspected;

(iii) details of how to make representations; and

(iv) the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;

(b) consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and

(c) send a copy of the proposals for a neighbourhood development plan to the local planning authority.

3.2 The Hallow Regulation 14 Draft Neighbourhood Plan was published for formal consultation for 8 weeks from June 15th to August 8th, 2020.

3.3 The Regulation 14 consultation was publicised with an article in parish magazine, and email to all those on electronic mailing list. Two hard copies were requested and provided. Leaflets were delivered to every business unit on the Elgar Business Park, leaflets posted to Hallow Business Park. Materials contained the dates of the consultation, when, how and who to return comments to.

3.4 Copies of the plan and supporting documents were made available on the HNBP web site <https://hallowndp.co.uk/>

- 3.5 A comment form was provided and downloadable from [the following webpage](#). Completed comment forms were to be returned to: hallowparishcouncil@gmail.com. A paper copy of the Neighbourhood Development Plan and/or the comment form could be obtained from the Clerk by telephoning or contacting the Parish Clerk by postal address.
- 3.6 With Covid-19 restrictions in place interested parties could request a telephone call or a ZOOM conference with the NDP lead Councillor to discuss any issues by contacting the Clerk to Hallow Parish Council.
- 3.7 All consultation materials set out when and to whom comments should be returned i.e. the Clerk to Hallow Parish Council.
- 3.8 A list of the consultation bodies' contact details was kindly provided by Malvern Hills District Council (Appendix 2) and all those on the list were sent a letter by email or post notifying them of the Regulation 14 public consultation and inviting comments. This list included:
- Individuals and businesses (including landowners and developers)
 - Adjoining parishes- Holt, Grimley and Ombersley.
 - Environment Agency
 - Worcestershire County Council
 - Local ward and county councillors
 - MP for West Worcestershire, Harriet Baldwin
 - Emails were also sent to local individuals and groups on the Parish Council mailing list.
- 3.9 A copy of the Draft Plan was sent to Malvern Hills District Council.
- 3.10 Tables 1 - 4 set out the responses received to the Regulation 14 Consultation. Tables 1 - 4 also include a column setting out the Parish Council's consideration of the response and the agreed action. These agreed actions were used to make amendments to the Regulation 14 Draft prior to submission.

**Table 1. Hallow Neighbourhood Development Plan – Malvern Hills District
Council Regulation 14 Responses and Recommended Action**

General Comments

As a context for our comments, the National Planning Policy Framework 2019 (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so, it sets out requirements for the preparation of Neighbourhood Plans and the role these should take in setting out policies for the local area. The requirements set out in the Framework have been supplemented by guidance contained in MHCLG's Planning Practice Guidance (PPG) on Neighbourhood Planning.

The strategic planning policy framework for the Hallow Neighbourhood Area is provided by the South Worcestershire Development Plan (SWDP) which was adopted in February 2016.

The housing requirement to 2030 in south Worcestershire is 28,370 dwellings. The SWDP makes provision for around 28,400 dwellings to meet this need. It should be noted that the South Worcestershire Councils have commenced a revision of the South Worcestershire Development Plan. The latest evidence of housing need is indicating that the revised SWDP will need to plan for approximately an additional 14,000 dwellings across south Worcestershire in the period 2021 to 2041. The South Worcestershire Councils consulted on the SWDP Preferred Options between November and December 2019, including a proposed housing allocation in Hallow at land south of Tinkers Coppice Farm (site reference CFS0343sc).

Planning Practice Guidance says that if a local planning authority is also intending to allocate sites in the same neighbourhood area it should avoid duplicating planning processes that will apply to the neighbourhood area. PPG says that a local planning authority should share evidence with those preparing the neighbourhood plan, in order for example, that every effort can be made to meet identified local need through the neighbourhood planning process. PPG says that a neighbourhood plan can also propose allocating alternative sites to those in a local plan, where alternative proposals for inclusion in the neighbourhood plan are not strategic, but a qualifying body should discuss with the local

planning authority why it considers the allocations set out in the strategic policies are no longer appropriate.

Following public consultation undertaken by the Parish Council in Hallow, the Parish Council requested in December 2019 that the proposed SWDPR allocation be replaced by an alternative site - an extension to an existing site south of Greenhill Lane (site reference CFS0136). The reasons for proposing site CFS0136 as an alternative to site CFS0343sc include:

- i. The land at Greenhill Lane is considered to form a natural extension to an existing SWDP allocation south of Greenhill Lane, would confine further new development to this area, and would utilise an existing access point on to the Main Road at Hallow;
- ii. The reason that the Greenhill Lane extension was not chosen as the preferred option in the SWDPR was due to concerns about the proximity of a gas pipeline. These concerns have been investigated and addressed by the Parish Council, including a statement from the Health & Safety Executive setting out the required buffer zone for the pipeline and information from CADENT gas;
- iii. Residents attending 5 public consultation events in Hallow in Autumn 2019 indicated a preference for site CFS0136 compared with site CFS0343sc because it would preserve the last green space along Main Road (Tinkers Coppice) and avoid the need for an additional access road onto the busy Main Road (the A443).
- iv. Site CFS0136 would avoid the partial use of a large site at the northern end of the village. v. Site CFS0136 could meet the housing requirement for Hallow Neighbourhood Area.

In light of the evidence provided by the Parish Council, and guidance in PPG which discourages duplicating planning processes and allows qualifying bodies to allocate alternative sites, the SWC agreed in principle to support the allocation of site CFS0136 to replace CFS0343sc.

The working relationship between the South Worcestershire Councils and Hallow Parish Council in relation to allocating sites for residential development in the Hallow Neighbourhood Plan is set out in a Memorandum of Understanding between the parties.

Whilst paragraph 69 of the Framework says that Neighbourhood Planning groups should consider the opportunities for allocating small and medium-sized sites suitable for housing in their area, the Framework does not require Neighbourhood Plans to allocate sites for housing. Paragraph 14 of the Framework does, however, confer a limited protection on Neighbourhood Plans which plan for housing where certain criteria are met. To benefit from the protection conferred by Paragraph 14 a Neighbourhood Plan would need to plan for housing through policies and allocations to meet the identified (or indicative) housing requirement in full, including possible allowance for some windfall development.

Following a request by Hallow Parish Council, the South Worcestershire Councils provided indicative housing requirement figures for the Hallow neighbourhood area in July 2019. The indicative housing requirement for the Neighbourhood Area for the period 2021 to 2030 was 1

dwelling (over-and-above existing allocations in the adopted SWDP). The indicative housing requirement for the Neighbourhood Area in the period 2031 to 2041 was a further 21 dwellings. It was highlighted that the housing requirement figures were “indicative”, should be considered as minimum requirements and may be subject to change, particularly as they were based on the current SWDP rather than the SWDPR.

It is considered that the proposed allocation of land of land at Green Hill Lane for a minimum of 40 dwellings would meet the indicative housing requirement in full. The District Council would like to congratulate the Parish Council for taking a proactive approach towards meeting the indicative housing requirement through the neighbourhood planning process.

PPG on Neighbourhood Planning includes the following guidance on what evidence is needed to support a Neighbourhood Plan and how Neighbourhood Plan policies should be drafted:

“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”.

“A policy in a Neighbourhood Plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared”.

As a general comment, it is considered that some policies are not currently drafted with sufficient clarity that a decision maker could apply them consistently and with confidence when determining planning applications. It is recognised that the requirements of some policies would only apply in larger developments or in particular locations, but policies which are to be applied “where appropriate and relevant” or “where possible and feasible” do not provide certainty for applicants and would be difficult to apply consistently and with confidence when determining planning applications.

Apart from Policy HAL1 (proposed land at Green Hill Lane) it is considered that the draft Neighbourhood Plan does not provide a strong steer about where the development of housing would be appropriate. In particular, it is unclear what types of development would be supported within and outside the development boundary.

It is also considered that some policies are quite generic and do not draw on the local evidence. For example, Policy HAL13 refers to information in the Historic Environment Record Search but the policy does not draw this information together to steer development away from inappropriate locations.

For ease of reference for applicants and decision makers it is suggested that the Policies Map is included in the main body of the

Neighbourhood Plan.

Where possible, we have suggested alternative wording for some policies to add clarity. These are only suggestions and it is obviously for the Steering Group to decide which suggestions to accept.

General comments noted – detailed matters for each policy are considered below.

Cover and Neighbourhood Area Map

1. Introduction and Background

2. Parish Portrait and Key Issues

Para 2.2 refers to the purpose of the Significant Gap. It may be worth noting that SWDPR paragraph 6.11 says that Significant Gaps maintain a clear separation between smaller settlements and urban areas. Amend to reflect this comment.

3. Planning Policy Context

4. Hallow Vision and Objectives

5. Hallow Neighbourhood Development Plan Policies

Para 5.1 refers to a Policies Map that accompanies the written document. It is suggested that the Policies Map is incorporated into the body of the Plan. **This comment has been made before. There is no requirement to do this. Map will not reproduce well at A4/A3 – no change.**

6. Housing

<p>Policy HAL1 – New Housing Development in Hallow Village 20212041</p> <p>The following site is allocated to meet housing requirements to 2041:</p> <p>HAL1/1 - Land at Green Hill Lane, Hallow (2.23 hectares gross, minimum 40 dwellings)</p> <p>Development of HAL1/1 will have to take account of the following:</p> <ul style="list-style-type: none">a) access should be via 2016 SWDP allocation SWDP59zzi;b) the need to provide an easement/buffer strip to separate the development from the gas pipeline to the south of the site; andc) the development should provide part of a dedicated cycle path between points 14 and 16 of the Broadheath Hallow Cycle Loop (Map 9). <p>Outside of the Hallow development boundary, where development is more strictly controlled, other proposals for new housing development will be assessed against all the relevant policies in the SWDP and the HNDP.</p>	<p>Policy HAL1 – New Housing Development in Hallow Village 20212041</p> <p>Policy HAL1 has 2 parts.</p> <p>Part 1 of Policy HAL1 proposes the allocation of a 2.23 hectare site at Green Hill Lane, Hallow for a minimum of 40 dwellings.</p> <p>The allocation would be subject to the following 3 conditions:</p> <ul style="list-style-type: none">a) Access to be via SWDP site allocation SWDP59zzi;b) Easement/buffer to the gas pipeline to be provided on the south of the site; andc) The development should provide a dedicated cycle path. <p>Part 2 of Policy HAL1 proposes that proposals for new housing outside the Hallow development boundary be assessed against relevant policies in the SWDP and HNDP.</p> <p>Paragraph 69 of the Framework says that Neighbourhood Planning groups should consider the opportunities for allocating small and medium-sized sites suitable for housing in their area.</p> <p>It is considered that the location of the proposed site at Land at Green</p>
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	<p>Hill Lane conforms with SWDP2 (Development Strategy and Settlement Hierarchy). Initial concerns from the South Worcestershire Councils regarding the proximity of the site to a gas pipeline have been satisfied by evidence provided by the Parish Council in correspondence from Cadent and the Health & Safety Executive.</p> <p>The site is capable of accommodating the minimum indicative housing requirement figures for the Hallow neighbourhood area provided by the South Worcestershire Councils to the Parish Council in July 2019.</p> <p>There does not currently appear to be a clear justification for condition (c) relating to the requirement for the site to provide part of a dedicated cycle path. Policy to be amended following discussion with landowner.</p> <p>Part 1 of Policy HAL 1 relates specifically to site allocation at Green Hill Lane. The title of the policy (and some text within the Reasoned Justification) is therefore potentially misleading because it implies that the allocation at Green Hill Lane will be the only housing development within the Hallow development boundary to 2041 – which may not be correct. It is suggested that it would be more appropriate to re-title the policy “Development of Land at Green Hill Lane” and that any text implying that the site will meet the need for housing in Hallow to 2041 are amended. Amend policy title as suggested.</p> <p>Part 2 of the Policy HAL1 says that the suitability of housing proposals outside the development boundary will be assessed against policies in the SWDP and HNDP. This is not a “policy” because planning law requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. It is therefore considered that Part 2 of Policy HAL1 is meaningless and should either be deleted or replaced by a more</p>
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	<p>precise policy. If the decision is to replace the policy, it is suggested that wording along the lines of Policy MH3 (New Residential Development beyond the Development Boundary) in the Malvern Town Neighbourhood Plan may be appropriate. Comment noted, no change, this will duplicate SWDP policy.</p> <p>The Reasoned Justification includes a number of incorrect or slightly misleading statements:</p> <ul style="list-style-type: none">• Para 6.2 – It is not strictly correct to say that development boundaries seek to ensure that “development is concentrated in the most urban areas (e.g. Worcester)”. Hallow, and other category 1, 2 and 3 villages, also have development boundaries. Amend to “development is concentrated in the urban areas (e.g. Worcester) and larger villages.”• Para 6.6 – The MoU is between the South Worcestershire Councils and Hallow Parish Council. Amend.• Para 6.6 – It is not necessarily correct to say that the allocation of the Green Hill Lane site will enable the HNDR to meet any identified housing requirement for Hallow over the period to 2041 that will be set in the SWDPR. At present it does. Amend to the “emerging indicative housing requirement.”• Para 6.7 -It is slightly misleading to say that the proposed housing site(s) helps to avoid housing development in more remote or environmentally sensitive locations because
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	<p>every planning application will have to be considered on its merits. Disagree, no change.</p> <ul style="list-style-type: none">• Paras 6.8 – 6.9 include a number of potentially misleading statements. The indicative housing requirement figures were prepared by officers from the South Worcestershire Councils (not the Joint Advisory Panel). It should be made clear that the
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	<p>indicative housing requirements are, by definition, “indicative” and may be subject to change. Further, the South Worcestershire Councils have made clear that they cannot preclude the possibility that there will be a need to allocate further sites in the neighbourhood area as the overall housing requirement will not be confirmed until the SWDPR examination Inspector’s report has been published. Amend to take on board these comments.</p> <ul style="list-style-type: none">• Paras 6.12 and 6.14 bullet 1 imply that the allocation at Green Hill Lane will meet housing needs to 2041. This may not necessarily be correct. Noted, see previous response.• Para 6.14 bullet 2 implies that HAL1 directs development away from the north, south and west of the neighbourhood area. This is not necessarily correct because any proposals for development in those areas will have to be considered on their merit. Disagree, this is what the policy is intended to do.• Para 6.14 bullet 6 – there appears to be no justification for the site allocation to provide a cycle path between points 14 and 16 on map 9. Indeed, much of the proposed cycle path between these points does not appear to be on the allocated site. Amend after discussion with landowner. <p>Table 4 – the relevance of past planning applications, commitments and completions to the allocation of the Green Hill Lane allocation is unclear. These figures show consistent delivery of new housing in neighbourhood area. No change.</p>
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<p>Policy HAL2 – Housing Need</p> <p>To be supported, all new housing development proposals of 5 or more units (subject to viability considerations) must demonstrate that they provide a range of types, sizes and tenures of housing to meet local housing need. Within the Neighbourhood Area there is a particular need for:</p> <ul style="list-style-type: none"> • Affordable housing (particularly 1 bedroom social rented units) • Affordable and open market 1 and 2 bedroom homes (e.g. starter homes for young people or homes for older people wishing to downsize) • Bungalows of different tenures <p>When determining the housing mix on a site, applicants should take account of, and demonstrate how their proposal meets the needs identified in the most up-to-date, local Housing Needs Assessment/Strategic Housing Market Assessment.</p> <p>Or where such assessments are considered to be out of date applicants should carry out and provide their own assessment of existing local housing needs and how their proposal will meet such needs.</p>	<p>Policy HAL2 – Housing Needs</p> <p>Policy HAL 2 proposes that all new residential development proposals of 5 or more units provide a mix of types, sizes and tenures of housing.</p> <p>The precise mix of housing to be assessed on a “site by site” basis, taking account of the most up-to-date information available on local housing needs or the applicants own assessment of local housing needs.</p> <p>Policy HAL1 indicates that there is currently a particular need for affordable housing, 1 and 2 bedroom dwellings for those seeking their first home and those looking to downsize, and bungalows.</p> <p>Policy HAL2 seeks to have regard to paragraph 61 of the Framework.</p> <p>Paragraph 6.15 of the Reasoned Justification suggests that the site allocation at Green Hill Lane (Policy HAL1) will provide a range of housing types to meet local need, but this is not clear from the conditions attached to Policy HAL1. Disagree, it will. HAL1 will also be assessed against other development plan policy that deals with mix, affordability etc.</p> <p>Paragraph 2 of Policy HAL2 starts with “When determining the housing mix on a site, applicants should ...” It is suggested that the first 8 words be deleted because the local planning authority determine planning applications, not applicants. Amend to “When preparing planning applications that include a mix of housing on a site, applicants should...”</p>
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	<p>Policy MWH1 is broadly consistent with SWDP 14 (Market Housing Mix). Noted, no change.</p> <p>It is noted that the focus of HAL2 is on the provision of 1 and 2 bedroom homes (and particularly the former). However, the evidence provided in paragraphs 6.16 and 6.17 indicates that only 4 households indicated a need for a 1 bedroom home. Comment noted, there is a still a need for starter homes and downsizing opportunities.</p>
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Policy HAL3 – Housing Design

New development should be informed by and retain and enhance the defining characteristics of the area of Hallow, Shoulton, Little Eastbury/Parkfield and the surrounding countryside in which it is situated. In identifying these characteristics applicants should use the *Hallow Design Guide* and other relevant studies e.g. those relating to landscape and heritage.

Applicants will be expected to demonstrate how a development proposal has taken account of, and been designed to incorporate, the recommended approach for each design element (e.g. windows, materials, boundary treatments, landscaping etc.) as set out in the *Hallow Design Guide*. This does not preclude innovative or contemporary design, where such design can be shown to respond to and provide a contemporary design solution that complements and reinforces local character.

Where relevant, development proposals should have a positive impact on the health and well-being of those living in, working in, otherwise using, or affected in other ways by the proposal. In this regard proposals should:

- a) enhance neighbourhood attractiveness, layout and design;
- b) provide opportunities for physical activity, active travel (walking, cycling, use of public transport);
- c) produce buildings and places that are accessible to all, but pay special attention to the needs of people with disabilities, older people, children and those with children; and

Policy HAL8 – Design

Policy HAL8 has 2 parts:

Part 1 of HAL8 proposes that all development proposals should demonstrate that the design has regard to the Hallow Design Guide (and other unspecified relevant studies), including the design for windows, materials, boundary treatments and landscaping.

Part 2 of HAL8 proposes that, where relevant, development proposals should have a positive impact on health and well-being and should:

- a) enhance neighbourhood attractiveness, layout and design;
- b) provide opportunities for physical activity, active travel (walking, cycling, use of public transport);
- c) produce buildings and places that are accessible to all, but pay special attention to the needs of people with disabilities, older people, children and those with children; and
- d) create healthy, safe, physically and visually attractive environments that promote social interaction, physical activity and opportunities for food growing.

The Government is seeking to support high quality design in all new development. Paragraph 124 of the Framework says good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this.

d) should create healthy, safe, physically and visually attractive environments that promote social interaction, physical activity and opportunities for food growing.

Paragraph 125 of the Framework says plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development.

Paragraph 126 of the Framework says that to provide maximum clarity about design expectations at an early stage, plans or supplementary planning documents should use visual tools such as design guides and codes. These provide a framework for creating distinctive places, with a consistent and high quality standard of design. However their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified.

Paragraph 131 of the Framework says that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

SWDP 21 (Design) seeks to ensure that new development will be of a high quality and integrates effectively with its surroundings and reinforces local distinctiveness. SWDP 21 is supported by the South Worcestershire Design Guide Supplementary Planning Document which was adopted in 2018.

	<p>The principle of Part 1 of Policy HAL8 is consistent with the Framework and SWDP 21. Comment noted. No change.</p> <p>Part 2 of Policy HAL8 sets out 4 requirements that should be part of all development proposals so that they have a positive effect on health and well-being. The principle of Part 2 of the policy is laudable but it would not be possible to apply the requirements to all developments for the following reasons. Firstly, Paragraph 55 of the Framework says that planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. Secondly, the opportunities for incorporating the proposed requirements are likely to be different for a single dwelling or extension compared to a larger development or group of new dwellings. Disagree. No change.</p> <p>Whilst Part 2 of HAL3 says that the policy should be applied “where relevant”, the policy does not state where such requirements would be relevant. The final sentence in paragraph 6.26 says that the health impacts and benefits should be set out in a Design and Access Statement. If the threshold for submission of Design and Access Statements triggers where Part 2 of HAL3 becomes “relevant” then this should be made clear so that it can be applied consistently and with confidence when determining planning applications. As background, the SWDP Design SPD says Design and Access Statements are only required with regard to residential development where the number of dwellings is in excess of 10, the site area is 0.5ha or above. In other types of development where the floor space is 1,000 square metres or more, or the site area is 1ha or above. Comment noted. No change.</p>
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6. Natural Environment and Rural Character

<p>Policy HAL4 – Landscape</p> <p>New development should be designed so that it protects or enhances the local landscape. Where appropriate and relevant, development proposals should be able to demonstrate (through submitted statements and studies) how they have taken into account the following:</p> <ul style="list-style-type: none"> 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. <p>New development, where relevant, should also be informed by Worcestershire County Council’s <i>Landscape Character Assessment Supplementary Guidance</i> and those sections of the <i>Hallow Design Guide</i> dealing with landscape matters. For proposals requiring a <i>Design and Access Statement</i> such statements should set out how the proposal has taken into account and responded to this and</p>	<p>Policy HAL4 – Landscape</p> <p>Policy HAL1 supports development that is designed so that it protects or enhances the local landscape.</p> <p>“Where appropriate and relevant” planning applicants are required to submit statements and studies demonstrating how their development proposals has taken account of the following 4 criteria:</p> <ul style="list-style-type: none"> a) Impact on the form, relationship, pattern and character of the neighbourhood areas different settlements; b) Respect for field systems and other historic boundaries; c) Whether buildings take account of key features in the landscape (e.g. routeways, hedgerows, trees, water features and watercourses); d) Newly planted trees, hedgerows or vegetation to be of native species and compatible with the surrounding landscape. <p>“Where considered necessary” landscaping proposals to include details for their long-term management and maintenance; and</p> <p>New development, “where relevant”, to be informed by:</p> <ul style="list-style-type: none"> a) Hallow Design Guide (2019); and b) Worcestershire County Council’s Landscape Character Assessment Supplementary Guidance.
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other relevant planning guidance.

[Note: proposals for housing development will also be assessed against Policy HAL3 – Housing Design.]

Design and Access Statements (where prepared) to set out how the development proposal has taken account of the Hallow Design Guide and WCC LCA Supplementary Guidance.

Paragraph 170 of the Framework says that planning policies should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.

Paragraphs 7.4 – 7.10 suggest that Policy HAL4 has been informed by Natural England’s “National Character Areas for England”, Natural England’s “Statements of Environmental Opportunity”, Worcestershire County Council’s Landscape Character Assessment. The reasoned justification also includes maps of key woodland habitats and ancient tree records (and “other notable trees identified by parishioners”), but it is not clear how this evidence has supported the approach taken in Policy HAL4 or how it is to be used in the application of the Policy.

Review again and amend if this needs to be made clearer.

It is considered that the intention of Policy HAL4 is laudable but it is not clear where or what types / sizes of development the policy should be applied to – the first part HAL4 says it should be applied “where appropriate and relevant” and the second part “where relevant”. It is therefore not clear to applicants whether Policy HAL4 would apply to their development proposals and it is not clear how an applicant should demonstrate that their development proposal meets the 4 criteria. **This will be for applicants and decision makers to exercise a judgement – no change.**

In light of the above, it is also not evident how a decision maker should react to a development proposal in accordance with paragraph 16 of the Framework. **See previous comment.**

	<p>The final paragraph of Policy HAL4 says that proposals for housing development will also be assessed against Policy HAL3 – Housing Design. It is not clear what the relevance of this is to Policy HAL4. Delete reference from policy as add to Background/Justification.</p>
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Policy HAL5 – Dark Skies

To minimise light pollution and improve views of the nighttime sky, planning proposals that include external lighting will have to demonstrate the following:

- a) They have undertaken an assessment of the level of obtrusive light that would be created and can demonstrate a need (e.g. for reasons of health or safety) for the level of external artificial lighting proposed; and
- b) That if the level of external lighting proposed is considered necessary, such lighting is limited in number, uses design features (e.g. siting, position, shielding, lighting technology and systems) that area designed to reduce any identified obtrusive lighting nuisance to a minimum.

Where buildings form part of new development light spill should also be reduced to a minimum by sensitively locating and orientating buildings within a site and by avoiding large areas of permanently exposed glazing.

Policy HAL5 has 2 parts.

Part 1 of Policy HAL5 requires any planning proposals that include external lighting to meet the following conditions:

- a) Undertake an assessment of the level of “obtrusive light” that would be created and the need for external lighting; and
- b) That such lighting is limited in number and designed to minimise “obtrusive lighting nuisance”.

Part 2 of Policy proposes buildings that form part of new development should be sensitively located and orientated and should avoid large areas of exposed glazing to minimise light spill.

Paragraph 180c of the Framework says that planning policies should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

However, paragraph 55 of the Framework also says that planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.

It is considered that the proposal that all planning proposals involving external artificial lighting undertake an assessment of the level of obtrusive light may be considered excessive. It is suggested that a policy along the following lines may be more appropriate – *“Where external lighting is proposed in a development it must be demonstrated that it is essential for the maintenance of health and safety by road users and building occupiers.”*

	<p>It is considered that Part 2 of Policy HAL5 would be more appropriately addressed in the Hallow Design Guide. Comments noted. No change.</p>
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<p>Policy HAL6 – Local Green Spaces</p> <p>The Local Green Spaces listed below and shown on the Policies Map and Map 13 will be protected.</p> <p>HAL6/1 – Tinkers Coppice Wood</p> <p>HAL6/2 – Gravel pit</p> <p>HAL6/3 – Old Churchyard</p> <p>HAL6/4 – Village Green</p> <p>HAL6/5 – Greenhill Fishing Ponds</p> <p>HAL6/6 – Woodland, east of Church Lane</p> <p>Where development of Local Green Spaces is proposed it must be consistent with national planning policy for Green Belt.</p>	<p>Policy HAL6 – Local Green Spaces</p> <p>Policy HAL6 proposes the designation of 6 Local Green Spaces (identified on the Proposals Map) on which any development must be consistent with national Green Belt policy.</p> <p>The proposed Local Green Spaces are:</p> <ol style="list-style-type: none">1. Tinkers Coppice Wood2. Gravel pit3. Old Churchyard4. Village Green5. Greenhill Fishing Ponds6. Woodland, east of Church Lane <p>The Framework makes provision for a Neighbourhood Plan to identify Local Green Spaces of particular importance to the local community. Paragraph 99 in the Framework says the designation of land as Local Green Space through Neighbourhood Plans allows communities to identify and protect green areas of particular importance to them.</p> <p>Local Green Space is a restrictive and significant policy designation. It gives the land a similar status to that of Green Belt and for that reason paragraph 100 of the Framework says that such designations should only be used when the green space is in reasonably close proximity to the community it serves, where it is demonstrably special to the local</p>
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	<p>community and holds a particular local significance, is local in character and not an extensive tract of land.</p> <p>The allocation of each Local Green Space requires robust justification. Table 7 on pages 66 – 67 of the draft Plan provides an assessment of the proposed 6 Local Green Spaces against the criteria in paragraph 100 of the Framework.</p> <p>It is noted that the heading for Table 7 includes a “note” regarding reference numbers. It is not clear what the purpose or relevance of the note is. It is suggested that this is either made clearer, included as a footnote, or deleted. This is to explain that a number of sites were assessed – some of which did not go forward – the references relate to this – retain.</p> <p>Map 13 shows the location of the 6 proposed Local Green Spaces that were assessed. The submission version of the Neighbourhood Plan should include a map (or maps) that clearly show the boundary of each proposed Local Green Spaces. Currently, it is considered that the scale of Map 13 is too small to clearly identify the boundary of sites 3 and 4. This map was included at MHDC’s request – retain this map – larger scale Policies Map shows the sites in more detail.</p> <p>Whilst paragraph 101 of the Framework says that policies for managing development within a Local Green Space should be consistent with those for Green Belts, it is considered that it would be more appropriate for the policy to say “Development on the <i>Local Green Spaces will not be supported except in very special circumstances.</i>” Disagree – no change – this comment misinterprets national policy – very special circumstances are only one aspect of Green Belt policy.</p>
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Policy HAL7 – Important Views

To be supported development proposals must demonstrate that they are sited, designed and of a scale such that they do not substantially harm the important views (identified on the Policies Map, Map 14 and

Policy HAL7 – Important Views

Policy HAL7 identifies 23 important views from locations freely accessible to the general public (shown on Map 14 and identified in

<p>in Table 3) when seen from locations that are freely accessible to members of the general public.</p>	<p>Table 8).</p> <p>Policy HAL7 seeks to ensure that development proposals are sited, designed and of a scale such that they do not substantially harm the 23 views and, where necessary, requires planning applicants to submit a Landscape and Visual Impact Assessment (LVIA).</p> <p>Paragraph 170 of the Framework says that the planning system should protect and enhance valued landscapes.</p> <p>Whilst national and local planning policy protects local character, it does not provide or protect a “right to a view.” Planning policies can seek to protect specific views where this is justified in the wider public interest (for example from a public footpath, right of way, roadside, or other publicly accessible land).</p> <p>Map 14 helpfully identifies the location and direction of the proposed Important Views. To provide a practical framework for decision makers (and applicants) it would be helpful if the location and numbering of the important views was clearer. It would also be helpful if the map showed the extent of the proposed Important Views.</p> <p>With the map not showing the extent of the Important Views it is not possible to determine the extent to which Policy HAL7 might undermine strategic policies in the SWDP or other Neighbourhood Plan policies. As an example, without showing the extent of the Important Views it is not possible to determine whether the proposed allocation in Policy HAL6 would conflict with Important View 15.</p> <p>Paragraph 7.19 says that the Important Views have been identified from the Hallow Conservation Area and Management Plan (2009) and</p>
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	<p>through the work of the Steering Group and a well-attended community walkabout. It is noted that a Background Report has been produced, setting out the “Methodology for Assessment of Green Spaces and Significant Views in Hallow”. Whilst the methodology Background Report sets out how important views were identified, neither Table 8 or the Background Report appear to grade the importance of the views.</p> <p>It is important that objective criteria are established for the identification and grading of views. For example, in visual assessments generally, published guidance such as Natural England’s LCA guidance and the Landscape Institute’s Guidance for Landscape and Visual Impact Assessment 3rd Edition (‘GLVIA3’) explain the factors which contribute to the highest levels of visual value. Attached for information and consideration are criteria to assist in assessing and ranking the value of important views. It is suggested that the criteria for assessing and ranking the value of important views in the Neighbourhood Area should be based on objective criteria, such as those attached.</p> <p>In terms of general conformity with strategic policies in the Local Plan, it should be noted that Policy SWDP 25 requires development proposals to take account of the latest Landscape Character Assessment and only requires a Landscape & Visual Impact Assessment (LVIA) or similar for major development proposals which are likely to have a detrimental impact on a significant landscape attribute or irreplaceable landscape feature.</p> <p>The emerging SWDPR29 (Landscape Character) proposes that a LVIA will be required for major development proposals and other proposals (outside defined development boundaries) where they are likely to have a detrimental impact on the landscape as a resource</p>
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	and / or views and visual amenity. Comment noted, no change.
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<p>Policy HAL8 – Green Infrastructure</p> <p>Where appropriate and relevant applicants should be able to demonstrate how new development:</p> <p>a) Maintains Hallow’s green infrastructure (Policies Map and Map 15), including the:</p> <ul style="list-style-type: none"> i. Recreational, 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 footpaths, bridleways, public rights of way and publicly accessible green space. <p>b) Responds to opportunities to restore existing green infrastructure; and</p> <p>c) Where possible and feasible it incorporates new green infrastructure that creates connections and links to the surrounding network of existing green infrastructure.</p> <p>Development that would disrupt or sever the existing green</p>	<p>Policy HAL8 – Green Infrastructure</p> <p>Policy HAL8 has 3 parts:</p> <p>Part 1 of Policy HAL8 identifies land on Map 15 as Green Infrastructure.</p> <p>Part 1a of HAL8 proposes that “where appropriate and relevant” applicants should demonstrate how their development proposal maintains the green infrastructure identified on Map 15 (including recreational, ecological, historic and landscape character functions of natural habitats; drainage and ecological value of the network of watercourses and features; and recreational function of existing footpaths, bridleways, public rights of way and publicly accessible green space).</p> <p>Part 1b of HAL8 proposes that “where appropriate and relevant” all new development proposals should demonstrate how they respond to opportunities to restore existing green infrastructure.</p> <p>Part 1c of HAL8 proposes that “where possible and feasible” proposals for development all new development proposals should demonstrate how they incorporate new green infrastructure that creates connections and links to the existing network of green infrastructure.</p> <p>Part 2 of Policy HAL8 says that development proposals that would disrupt or sever the existing green infrastructure network (presumably land identified on Map 15?) would not be supported.</p>
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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 setting out how the resource will be managed and maintained.

Part 3 of Policy HAL8 relates to the management of new green infrastructure and says that any development proposal which would create new green infrastructure should be accompanied by a management plan setting out how the green infrastructure will be managed and maintained.

Green Infrastructure (GI) is defined in the Framework 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.

Paragraph 20 of the Framework says that **strategic policies** should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for, amongst other things, green infrastructure.

Paragraph 171 of the Framework says that plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure.

The strategic policy SWDP 5A (Green Infrastructure) requires housing development proposals (including mixed-use schemes) to contribute towards the provision, maintenance, improvement and connectivity of GI as follows (subject to financial viability):

- i. For greenfield sites exceeding 1ha (gross) - 40% Green Infrastructure
- ii. For greenfield sites of less than 1ha but more than 0.2ha (gross) – 20% Green Infrastructure.

	<p>iii. For brownfield sites – no specific Green Infrastructure (GI)</p>
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	<p>figure.</p> <p>The strategic policy SWDP 5 B says the precise form and function(s) of GI will depend on local circumstances and the Worcestershire Green Infrastructure Strategy’s priorities. Developers should seek to agree these matters with the local planning authority in advance of a planning application. Effective management arrangements should also be clearly set out and secured. Once a planning permission has been implemented, the associated GI will be protected as Green Space.</p> <p>The strategic policy SWDP 5C says that other than specific site allocations in the development plan, development proposals that would have a detrimental impact on important GI attributes within the areas identified as “protect and enhance” or “protect and restore”, as identified on the Environmental Character Areas Map , will not be permitted unless:</p> <ol style="list-style-type: none">i. A robust, independent assessment of community and technical need shows the specific GI typology to be surplus to requirements in that location; andii. Replacement of, or investment in, GI of at least equal community and technical benefit is secured. <p>Comments about Policy HAL8 include:</p> <ul style="list-style-type: none">• Paragraph 7.21 suggests that the extent of the proposed Green Infrastructure (Map 15) is based on Maps 10 (Woodland Habitats), 11 Ancient tree records + notable trees identified by parishioners), 16 (Significant Trees?), 17 Biodiversity Action Plan habitat core areas and dispersal extent) and 18 (Ponds).
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	<p>Is Map 15 an amalgam of those maps or is the extent of Green Infrastructure on Map 15 based on Worcestershire County Council’s Environmental Character Areas (ECAs); ‘Protect and Restore’ and ‘Protect and Enhance’? Clarification on the basis of Map 15 would be helpful to establish the extent to which Policy HAL 8 is in general conformity with SWDP 5C. Policy has used all these sources, amend to provide greater clarity.</p> <ul style="list-style-type: none">• Part 1c of Policy HAL8 appears to duplicate SWDP 5A, but is less precise and weaker – it would only apply “where possible and feasible” and does not specify how much Green Infrastructure is to be provided. Paragraph 30 of the Framework says that once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently. Amend 1c to take account of SWDP5A or delete.• Policy HAL8 indicates that conditions a) and b) should be applied “where appropriate and relevant” and condition c) should be applied “where possible and feasible”. It is considered that Part 1 of Policy HAL8 lacks sufficient clarity for it to be evident how a decision maker should react to a development proposal in accordance with paragraph 16 of the Framework. Comment noted, no change.
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- The Green Infrastructure provision on Map 15 appears to cover 'strategic GI' but does not cover localised and/or urban green space opportunities/issues/threats. It is suggested that the policy could be amended to cover urban green spaces or that

	<p>reference is made to the fact that urban green spaces would be covered by SWDP 38 (Green Space) or its successor policy. Amend as suggested.</p> <p><i>To address a number of the above comments it is suggested that a rewording of Policy HAL8 along the following lines may be appropriate:</i></p> <p><i>Development proposals that impact on Hallow's Green Infrastructure Network (shown on the Policies Map and Map 15) should demonstrate how new development:</i></p> <p><i>a) Maintains Hallow's green infrastructure network, including key features such as the:</i></p> <ul style="list-style-type: none"><i>i. Ecological, historic and landscape character functions of natural habitats;</i><i>ii. Drainage and ecological value of the network of watercourses and features; and</i><i>iii. The recreational function of existing publicly accessible green space, including footpaths, bridleways, public rights of way.</i> <p><i>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.</i></p> <p><i>Consideration should also be given to the incorporation of connections and links to the surrounding network of existing green infrastructure, where relevant.</i></p> <p><i>Development that would disrupt or sever the existing green</i></p>
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	<p><i>infrastructure network will not be supported.</i></p> <p><i>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. Amend as suggested.</i></p>
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<p>Policy HAL9 – Biodiversity</p> <p>Where appropriate and relevant new development will be expected to provide a net gain in biodiversity, by:</p> <ul style="list-style-type: none"> a) Retaining existing wildlife habitats and landscape features (such as woodland, ancient and notable trees (Table 9 and Map 16), watercourses, ponds, unimproved grassland and orchards) to support biodiversity; b) Creating new wildlife habitats c) Including native flora in new planting such as hedgerows, landscaping and open spaces; d) Creating a biodiversity-friendly environment by including features such as bat boxes, bird boxes, nest cups, and bee bricks; and e) By including wildlife friendly boundary treatments that facilitate the movement of species. <p>Residents of new dwellings should be provided with information on the biodiversity features integrated into new housing development.</p>	<p>Policy HAL9 – Biodiversity</p> <p>Policy HAL9 proposes that all new development proposals should, where appropriate and relevant, provide a net gain in biodiversity by incorporating the following 5 features:</p> <ul style="list-style-type: none"> a) Existing wildlife habitats and landscape features (e.g. woodland, ancient and notable trees, watercourses, ponds, unimproved grassland and orchards) to be retained or created; b) New wildlife habitats to be created; c) Native flora in hedgerows, landscaping and open spaces to be planted; d) Biodiversity-friendly environment to be created (by including features such as bat boxes, bird boxes, nest cups, and bee bricks); and e) Wildlife friendly boundary treatments to be included that facilitate the movement of species. <p>Residents of new dwellings to be provided with information on the biodiversity features integrated into their new home.</p> <p>The reasoned justification says that a preliminary ecological appraisal</p>
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	<p>should be prepared by a competent ecologist to advise on the most expedient and appropriate measures for each site.</p> <p>Paragraph 170d of the Framework says that planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.</p> <p>Paragraph 55 of the Framework says that planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.</p> <p>The principle of Policy HAL9 is laudable but it is considered that the proposed requirements would not be reasonable for all small-scale development proposals or enforceable and may not have regard to paragraph 55 of the Framework. Comment noted, policy includes where appropriate and relevant – no change.</p> <p>It is noted that it is proposed that Policy HAL9 would only be applied “where appropriate and relevant” but the policy provides no guidance about when and where its application would be appropriate or relevant. It is therefore considered that Policy HAL9 currently lacks sufficient clarity for applicants or for it to be evident how a decision maker should react to a development proposal in accordance with paragraph 16 of the Framework. Comment noted no change.</p> <p>SWDP 22 (Biodiversity and Geodiversity) addresses biodiversity at a more strategic level. SWDP22 says development which would compromise the favourable condition or the favourable conservation status of a Grassland Inventory Site (GIS), a Local Wildlife Site (LWS),</p>
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	<p>a Local Geological Site (LGS), an important individual tree or woodland and species or habitats of principal importance recognised in the Biodiversity Action Plan, or listed under Section 41 of the Natural Environment and Rural Communities Act 2006, will only be permitted if the need for and the benefits of the proposed development outweigh the loss.</p> <p>It is noted that community volunteers identified “notable trees” in the Neighbourhood Area. It appears that the methodology was based largely on tree size. It is noted that Table 9 lists “significant trees”, whilst the heading for Map 15 is “Green Infrastructure Network”. Presumably, the heading for Map 15 should either be “notable trees” or “significant trees”? Amend Map title.</p>
8. Community and Recreation Facilities	

<p>Policy HAL10 – Community Facilities and Local Shops</p> <p>The following community facilities identified and shown on the Policies Map and Map 19 are protected.</p> <p>HAL10/1 – Church of St Philip and St James</p> <p>HAL10/2 – Hallow Parish Hall</p> <p>HAL10/3 - The Crown Inn</p> <p>HAL10/4 – Hallow Sports and Social Club</p> <p>Proposals that would result in the loss of these community facilities</p>	<p>Policy HAL10 – Community Facilities and Local Shops Policy</p> <p>HAL9 has 4 parts.</p> <p>Part 1 of Policy HAL10 resists the loss of 4 existing community facilities (identified on Map 19) unless it can be demonstrated that the proposal meets the criteria in SWDP Policy 37B (or its successor).</p> <p>The 4 community facilities are:</p> <ol style="list-style-type: none">1. Church of St Philip and St James2. Hallow Parish Hall3. The Crown Inn
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<p>will only be supported if the criteria set out in SWDP Policy 37B (or its successor) are met.</p> <p>Proposals for enhancement of the identified community facilities or new community facilities, particularly health facilities, will be supported when positively assessed in relation to SWDP Policy 37A (or its successor).</p> <p>The following local shops identified and shown on the Policies Map and Map 19 will be protected:</p> <p>HAL10/5 - Post Office Stores HAL10/6 - Ladygo stores</p> <p>Proposals for change of use of these local shops will only be supported where the shop use is no longer commercially viable and it has been demonstrated that the premises have been marketed (including locally) for retail use for at least 12 continuous months; or there is an alternative equivalent retail unit within safe walking distance to the local community.</p>	<p>4. Hallow Sports and Social Club</p> <p>Part 2 of Policy HAL10 supports the enhancement of the 4 community facilities and development of new community facilities, particularly health facilities, subject to criteria in SWDP Policy 37A (or its successor) being met.</p> <p>Part 3 of Policy HAL10 resists the loss of 2 existing local shops (identified on Map 19) unless it can be demonstrated that the proposal meets the criteria in SWDP Policy 37B (or its successor).</p> <p>The 2 local shops are:</p> <ol style="list-style-type: none">1. Post Office Stores2. Ladygo stores <p>Part 4 of Policy HAL10 supports proposals for change of use to these local shops subject the shop being no longer commercially viable and demonstration that the premises have been marketed (including locally) for retail use for at least 12 continuous months; or there is an alternative equivalent retail unit within safe walking distance to the local community.</p> <p>Paragraph 92 of the Framework says planning policies should plan positively for community facilities and guard against the unnecessary loss of valued facilities and services.</p> <p>Map 19 helpfully shows the location of the community facilities and shops that are to be protected under Policy HAL10, although it is noted that the location of HAL10/6 is not shown. Amend Map.</p> <p>It is considered that Part 1 of Policy HAL10 is in general conformity</p>
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	<p>with SWDP 37B. Noted.</p> <p>It is considered that Part 2 of Policy HAL10 is in general conformity with SWDP 37A. Noted.</p> <p>It is considered that Part 3 of Policy HAL10 is in general conformity with SWDP 37B. Noted.</p> <p>It is considered that Part 4 of Policy HAL10 is in general conformity with SWDP 10. Noted.</p> <p>It is worth noting that neighbourhood planning gives communities direct power to choose where they want new development to take place and grant planning permission for the new buildings they want to see go ahead. In light of this, if Hallow wanted any particular new community facilities then the neighbourhood plan provides the opportunity for the community to decide where it wishes these facilities to be developed. Noted. No change.</p>
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<p>Policy HAL11 – Recreation</p> <p>The following recreation facilities, also shown on the Policies Map and Map 20 will be protected.</p> <p>HAL11/1 – Playing Fields and pavilion HAL11/2 - Hollybank and children’s playground HAL11/3 - Scout hut HAL11/4 – Hallow Tennis Club</p>	<p>Policy HAL11 – Recreation</p> <p>Policy resists the loss of 5 existing recreation facilities (identified on Map 20) unless it can be demonstrated that the proposal meets the criteria in SWDP Policy 38.</p> <p>The 5 community facilities are:</p> <ol style="list-style-type: none">1. Playing Fields and pavilion2. Hollybank and children’s playground3. Scout hut4. Hallow Tennis Club5. Allotments
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<p>HAL11/5 – Allotments</p> <p>Development affecting these sites will be considered against SWDP Policy 38.</p>	<p>It is considered that most (if not all) of the proposed recreation facilities meet the definition of community facilities. It is therefore unclear why proposals for development affecting these sites would be assessed against SWDP 38 (Green Space) rather than SWDP 37A (which would relate to the enhancement of the facilities) and SWDP 37B (which would relate to the potential loss of these facilities. Is this an oversight? Amend SWDP policy references.</p> <p>Paragraph 8.11 says that the Parish Council will support improvements to key facilities. It should be noted that as currently worded Policy HAL11 only relates to proposals for the loss of the facilities, not proposals for their enhancement. This is covered by SWDP policy – add reference.</p> <p>Because most (if not all) of the recreation facilities listed in HAL11 meet the definition of community facilities, it is suggested that they could be added to Policy HAL10. Parts 1 and 2 of Policy HAL10 could address the loss and enhancement of the recreation facilities. Noted, no change.</p>
<p><u>Potential Action for Parish Council</u></p> <p>Protection of community assets</p> <p>To support the maintenance of village facilities (shops, schools, public houses, churches, recreational facilities) the Parish Council will nominate or support nomination of local facilities as Assets of Community Value. Once identified such assets, if put up for sale, are subject to a local community opportunity to purchase at market value. There are no Hallow properties on the latest register.</p> <p>https://www.malvern hills.gov.uk/community/localism-andcommunities/assets-of-community-value accessed 05/02/20</p>	<p>Planning Practice Guidance says that “wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but actions dealing with non land use matters should be clearly identifiable. For example, set out in a companion document or annex.”</p> <p>The designation of Assets of Community Value is an entirely separate process to neighbourhood planning. This is recognised in the Neighbourhood Plan which makes clear that this is an action for the Parish Council and is not a land-use policy. Noted, no change.</p>

9. Built Heritage

<p>Policy HAL12 – Hallow Conservation Area</p> <p>New development should preserve Hallow Conservation Area (Map 21) within the setting of Hallow’s semi-rural character. New development should:</p> <ul style="list-style-type: none"> a) Maintain the historic pattern of built form and open spaces by respecting the pre-dominant character and architectural style of the historic zone (as identified in the Hallow Conservation Area Appraisal and Management Strategy (MHDC 2009)), within which the development is situated, such as The Green and Hallow Park; b) Complement and be sympathetic to the scale, height and massing of existing historic development in the context of both the immediate surrounding area (i.e. the defined zone in which the development is to be situated) and the wider Conservation Area; c) Retain and reflect the fenestration and roof height, design and orientation found in the elevations of the historic zone and adjacent traditional buildings; d) Retain, replace, employ key features such as window openings, sash windows, local detailing and architectural decoration; 	<p>Policy HAL12 – Hallow Conservation Area</p> <p>Policy HAL12 seeks to preserve or enhance Hallow Conservation Area (shown on Map 21) and its setting by requiring proposals for new development to adhere to 11 principles, summarised below:</p> <ul style="list-style-type: none"> a) Maintain the historic pattern of built form and open spaces; b) Complement and be sympathetic to the scale, height and massing of existing historic development; c) Retain and reflect the fenestration and roof height, design and orientation found in the elevations of the historic zone and adjacent traditional buildings; d) Retain, replace, employ key features such as window openings, sash windows, local detailing and architectural decoration; e) Retain existing road, street and lane patterns; f) Use high-quality local and traditional materials sympathetic to the building and historic zone; g) Retain historic building plot and field boundaries; h) Retain key elements of public realm. Where opportunities arise removal of unsympathetic elements of the public realm; i) Protect important views into and out of the Conservation Area and between buildings; j) Retain mature trees, landscaping and hedges, public and private green spaces (including private gardens); and k) Where possible and appropriate, remove and replace negative
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<p>e) Retain existing road, street and lane patterns e.g. Church Lane;</p> <p>f) Use high-quality local and traditional materials sympathetic to the building and historic zone within which the development is situated (these include, but are not limited to, clay tile, brick, render and timber);</p> <p>g) Retain historic building plot and field boundaries, and where these include replacement boundary treatments, such treatments are of good quality and appropriate by way of materials (brick, fencing, hedges), design (informal e.g. hedges and formal e.g. walls) and construction to the building plot and those of adjacent building plots;</p> <p>h) Retain key elements of public realm (e.g. the K6 telephone kiosk) and where new public realm is proposed this should seek to retain the area's semi-rural character through its design and use of materials. Where opportunities arise removal of unsympathetic elements of the public realm e.g. highway and telecommunications infrastructure;</p> <p>i) Protect the important views into and out of the Conservation Area and between buildings as identified in the Hallow Conservation Area Appraisal and Management Strategy. See also Policy HAL3;</p> <p>j) Retain mature trees, landscaping and hedges, public and private green spaces (including private gardens). Within a building plot the ratio of buildings to open space should be broadly retained to preserve the area's predominant open, green character. If opportunities arise to</p>	<p>features within the Conservation Area that are the product of previous unsympathetic development or alterations.</p> <p>Paragraph 184 of the Framework says that heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.</p> <p>Paragraph 200 of the Framework says that local planning authorities should look for opportunities for new development within Conservation Areas to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.</p> <p>Paragraph 201 of the Framework says that not all elements of a Conservation Area will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area as a whole.</p> <p>Policy Hal12 appears to have regard to the Framework.</p> <p>It is noted that Policy HAL12 applies to new development only. It is suggested that the policy should apply to all applications affecting the Conservation Area. Amend as suggested.</p>
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create new open areas these should use sympathetic materials for their boundaries and surfacing, so that they are appropriate to a semirural location and avoid introducing urban designs, styles and materials; and

k) Where possible and appropriate, remove and replace negative features within the Conservation Area that are the product of previous unsympathetic development or alterations, e.g. car parking and drive surfaces, windows, uPVC conservatories, boundary treatments and unsympathetic domestic extensions.

<p>Policy HAL13 – Non-designated Heritage Assets</p> <p>The Parish Council are seeking to add non-designated heritage assets to the Malvern Hills Local List. Comments and observations are being sought as part of the HNBP Regulation 14 consultation on the following potential additions to the Local List:</p> <ul style="list-style-type: none">• Walls and lodges of Parkfield• Melbourne• Gates to Green Park• Hallow Mount• Shoulton Farm• Shoulton House Farmhouse• Hallow Park	<p>Policy HAL13 – Non-designated Heritage Assets</p> <p>Policy HAL13 has 2 parts.</p> <p>Part 1 of Policy HAL13 seeks to nominate 30 non-designated heritage assets for consideration in the District Council’s Local List Supplementary Planning Document.</p> <p>Part 2 of Policy HAL13 proposes that the suitability of development proposals affecting non-designated heritage assets (including the 30 nominated assets) be assessed against SWDP 24 (Management of the Historic Environment) or its successor.</p> <p>Heritage assets are an irreplaceable resource and paragraph 184 of the Framework requires that historic assets should be conserved in a manner that is appropriate to their significance.</p> <p>Policy HAL11 helpfully distinguishes between designated heritage assets (such as listed buildings and conservation areas) and other heritage assets (identified by the local authority).</p>
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<ul style="list-style-type: none"> • Archbell Cottages • Hallow Mill • Heath Farmhouse and barns • Congregational Chapel • Clematis Cottage • Dove Cottage • Woodmanton Cottage • The Laurels • Greenhill farmhouse and barns • Hop Pole Cottage <p><u>Unlisted buildings of merit within the Conservation Area:</u></p> <p><u>Main Road</u></p> <ul style="list-style-type: none"> • Cedar House • The Pound House <p><u>On Hallow Green</u></p> <ul style="list-style-type: none"> • The Dower House • Post Cottage • Barley Mow Cottages • Elmley House • Maryland Cottages 	<p>It is considered appropriate for the Parish Council to nominate nondesignated heritage assets for consideration in the MHDC Local List SPD through the neighbourhood plan process. Disagree – this an opportunity for local community to be involved in this process. However, it is considered that a number of important changes or amendments are made to the policy and reasoned justification:</p> <ul style="list-style-type: none"> • It is important when proposing local heritage assets to ensure that they meet the necessary criteria. The Local List SPD (May 2015) says that local heritage assets will need to be significant with regard to at least one of the following - a significant period in the District's history, the social history of the District or a notable example of planned or incidental planning, or associated with an individual of local importance. In addition, a nominated asset will need to be significant having regard to one or more of the following – age, rarity, aesthetic value, group value, evidential value, archaeological interest, designed landscape, landmark status and social / communal value. It should be noted, however, that the Local List SPD is undergoing review and is due to go out for public consultation in February 2020. • Policy HAL11 proposes 30 Non-Designated Heritage Assets. It is considered that the list of proposed assets should be included in an Appendix or separate Background Report because they are not non-designated assets - at this stage they are “proposed”. To list the assets in Policy HAL11 would indicate a status that they do not currently have. Include in the HNDP and feed entries into MHDC Local Listing process. • It is suggested that the Neighbourhood Plan includes a section titled “Action for the Parish Council” which sets out the
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	<p>Parish Council's intention to submit a list of proposed Non-Designated Heritage Assets to the District Councils for consideration in the Local List SPD. The proposed nominations can be based on assets identified through the neighbourhood planning process.</p>
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<ul style="list-style-type: none">• Post Cottage• Barley Mow Cottages• Elmley House• Maryland Cottages <p><u>Other features</u></p> <ul style="list-style-type: none">• The see-saw• Telephone kiosk <p>The Parish Council, as part of the Regulation 14 consultation on the HNDP, would also welcome the nomination of other heritage assets for consideration and potential inclusion on the Local List.</p> <p>Once added to the Local List development proposals affecting assets on the Local List and other non-designated heritage assets will be assessed against Policy SWDP24 of South Worcestershire Plan (or its successor following the SWDP Review).</p>	<p>It is suggested that a re-wording of Policy HAL13 along the following lines would be appropriate:</p> <p><i>“To be supported proposals which affect a non-designated heritage asset (a building or structure on the Local List [following adoption by Malvern Hills District Council]) must demonstrate how they protect or enhance the heritage asset.</i></p> <p><i>To be supported, the renovation or alteration of a non-designated heritage asset (building or structure) must be designed sensitively, and with careful regard to the heritage asset’s historical and architectural interest and setting.</i></p> <p><i>Where a proposal would result in harm to the significance of a nondesignated heritage asset the scale of the harm and the significance of the asset must be balanced against the benefits of the proposal.”</i></p>
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Policy HAL13 – Archaeological Assets

Development proposals should conserve or enhance known surface and sub-surface archaeology included in the Worcestershire Historic Environment Record. Lack of current evidence of surface and sub-surface archaeology must not be taken as proof of absence and where potential for such remains are considered to exist, proposals

It is noted that the Archaeological Assets policy should be Policy HAL14 (not HAL13). Amend.

Policy HAL13 – Archaeological Assets

Policy HAL13 requires all development proposals in areas shown on maps in the Worcestershire Historic Environment Record (HER) to conserve or enhance known surface and subsurface archaeology.

Policy HAL13 proposes that a lack of current evidence of surface or

<p>may be subject to planning condition.</p>	<p>sub-surface archaeology must not be taken as proof of absence and that any proposals where potential archaeology exists would be subject to planning condition.</p> <p>Paragraph 189 of the Framework says that where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk based assessment and, where necessary, a field evaluation.</p> <p>SWDP 24 (Management of the Historic Environment) says that where proposals are likely to affect heritage assets with archaeological interest they should be accompanied by a description informed by available evidence, desk-based assessment and, where appropriate, field evaluation to establish the significance of known or potential heritage assets.</p> <p>Paragraph 9.17 says that the Worcestershire Historic Environment Record Search (HERS) lists the known archaeological remains in the area. In order to provide greater certainty for applicants and to enable decision makers to apply Policy HAL13 consistently and with greater confidence it is suggested that these sites of archaeological interest are listed in the policy and their location is shown on a map.</p> <p>Further, Policy HAL13 does not explain what action applicants must take to conserve or enhance known surface and sub-surface archaeology.</p> <p>To address the above issues it is suggested that policy wording along the following lines may be appropriate:</p> <p><i>“Development proposals in areas listed below and shown on Map X should take account of known surface and sub-surface archaeology,</i></p>
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	<p><i>and ensure unknown and potentially significant deposits are identified and appropriately considered during development. Lack of current evidence of sub-surface archaeology must not be taken as proof of absence.</i></p> <p><i>Where proposals are likely to affect heritage assets with archaeological interest they should be accompanied by a description informed by available evidence, desk-based assessment and, where appropriate, field evaluation to establish the significance of known or potential heritage assets.</i></p> <p><i>Known archaeological sites are at:</i></p> <ul style="list-style-type: none">• X• Y• Z <p><i>The above sites should not be taken as a definitive or exhaustive list of sites / areas of archaeological interest in the Neighbourhood Plan area.”</i></p> <p>Amend as suggested.</p>
10. Transport and Infrastructure	

<p>Policy HAL15 – Sustainable Transport</p> <p>New development should seek to reduce reliance on the private car and increase opportunities for active travel (use of public transport, walking and cycling) by incorporating measures that improve facilities, infrastructure and the environment for pedestrians, cyclists. public transport and its users. In particular, the following will be supported:</p>	<p>Policy HAL15 – Sustainable Transport</p> <p>Policy HAL15 supports sustainable transport (use of public transport, walking and cycling) by encouraging new development to improve facilities for pedestrians, cyclists and public transport.</p> <p>Policy HAL15 provides in-principle support for the following 6 transport initiatives:</p> <ul style="list-style-type: none">i. A cycle route on the eastern side of the village. It is proposed
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<p>i. Provision of a cycle route on the eastern side of the village. This will also form a safe route for children cycling to and from the Primary School. Where relevant and feasible new development should include a marked cycle path to link into this new route. ii. Creation of a dedicated off-road cycle route to Worcester. iii. Enhanced bus transport infrastructure. iv. Creation of opportunities for shared transport.</p> <p>v. Improved pedestrian and cycle links to key facilities identified in the HNNDP.</p> <p>vi. Improvements and new connections to existing Public Rights of Way (PROW) (Table 7, Map 22) and the creation of new PROW.</p>	<p>that new development should include a cycle path to link into this route (where relevant and feasible). ii. A dedicated on-road cycle route to Worcester.</p> <p>iii. Enhanced bus transport infrastructure. iv. Creation of opportunities for shared transport.</p> <p>v. Improved pedestrian and cycle links to key facilities identified in the Neighbourhood Plan.</p> <p>vi. Improvements and new connections to existing Public Rights of Way (PROW) (Table 7 and Map 22) and the creation of new PROW.</p> <p>The intentions of Policy HAL15 are laudable, albeit opportunities to incorporate measures to improve facilities for pedestrians, cyclists and public transport are only likely to exist in larger developments or a group of dwellings. Noted.</p> <p>It is noted, however, that the proposed allocation in Policy HAL1 does propose that the development provides part of a dedicated cycle path. It is suggested that the Parish Council should liaise with Sustrans and the County Council regarding the feasibility of the proposed cycle path.</p> <p>It is noted that Map 22 helpfully shows the location where improvements to the PROW network would be supported. Noted.</p>
<p>Potential Actions for Parish Council Improved bus services To work with Worcestershire County Council and service providers to improve the frequency of services serving Hallow.</p>	<p>Planning Practice Guidance says that “wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but actions dealing with non land use matters should be clearly identifiable. For example, set out in a companion document or annex.”</p> <p>The provision of bus services is a non-land use matter. It is</p>

	<p>considered that the Neighbourhood Plan makes clear that the proposed work with the County Council regarding bus services would be an action for the Parish Council and not a land-use policy. Noted.</p>
<p>11. Monitoring and Review</p>	
<p>Glossary of Terms</p>	
<p>Appendices</p>	
	<p>Planning Practice Guidance says that wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but actions dealing with non land use matters should be clearly identifiable. For example, set out in a companion document or annex.</p> <p>In light of the above it is suggested that it may be more appropriate to include the Potential Actions for the Parish Council as an Appendix. Noted, no change.</p>

Table 2. Hallow Neighbourhood Development Plan – Regulation 14 Responses and Recommended Action

			HALLOW N.D.P. REGULATION 14 COMMENTS RECEIVED		
Comment Number	Name of Respondent	Support	Oppose	Pages Commented on	Parish Council Response
1	Susan Collier	✓		whole document pages - 30 -31 in particular <i>“I am not a Hallow Resident, but live in neighbouring Ombersley Parish. I am the Parish Council Lead for developing the Ombersley and Doverdale N.D.P. As such I can appreciate all the time and effort taken in producing the draft document, and commend your efforts and result. The document is clear and well presented. The vision, objectives and policies are clear and to be supported. Altogether a well constructed and thought out plan. I hope we can achieve similar for our own parish”.</i>	Noted and Thank you.
2	James Rose	✓		whole document. <i>“I am sending this form in support of the NDP and to comment that I agree with the stated aims”</i>	Noted

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3	Margaret Rose	✓	<p>whole document. <i>"I am sending this form in support of the NDP and to comment that I agree with the stated aims"</i></p>	Noted
4	Harriet Baldwin	✓	<p>whole document <i>"I am writing this response as Member of Parliament for West Worcestershire and although I do not make formal comment on individual planning matters, I fully support the Neighbourhood Plan process and want to formally congratulate the team on this comprehensive piece of work. I hope that, following the appropriate consultation, this plan will go forward to referendum. I note that the Hallow Plan includes a strategic gap between the parish of Hallow and Worcester City. This is important in order to retain the distinctive character of Hallow. I note that the Hallow Plan includes a focus on cycle routes. I would be very supportive</i></p>	<p>1) Hallow Parish Council (HPC) and Hallow NDP Group are committed to maintaining the "Significant Gap" between Hallow and Worcester City. This is one of the biggest wishes of Hallow residents as expressed in public information events and community survey responses. We appreciate the supporting comment.</p> <p>2) Cycle route- we are proposing a small improvement to an existing route as this point in time, particularly to enable children to get from east side of Main Road to the zebra crossing</p>

			<p><i>of easier travel for cyclists between Worcester and Hallow and Hallow and Lower Broadheath.</i></p> <p><i>Constituents have raised concerns about speeding traffic through the village and I would welcome measures which encourage traffic calming. I also note that the pedestrian crossing in the village was made possible by developer contributions and would welcome other such allocation of funds to benefit local residents.</i></p> <p><i>Finally, as Associate Governor and supporter of Hallow Primary School, I am keen to see the school grown organically and I welcome the construction of new family homes which will allow regular demand for reception places at this quintessential village school”.</i></p>	<p>and to school safely. In the future HPC would hope to pursue a greater length of cycle route and will engage with MHDC and WCC on this issue.</p> <p>3) The zebra crossing was controversial at the time but has proved very beneficial to Hallow School. HPC have and will continue to actively pursue with Highways and WCC any traffic calming measures that would decrease speeding on the A443 through Hallow.</p> <p>4) We have actively liaised with Hallow School Governors (who have made their own comments below). HPC are also committed to organic growth of Hallow School and to maintaining its current Ofsted rating.</p>
5	Joy Fulcher	✓	<p>12; 13; 37</p> <p><i>2”I strongly support the preservation of the Significant Gap south of Hallow (Map3 – page 13 is an excellent illustration) and to direct new development when allocating housing sites, to protect the open countryside in the more environmentally sensitive areas of the neighbourhood area found to the north west including the Significant Gap to the South between Hallow and Worcester”</i></p>	<p>HPC agree with this comment and have actively striven to do so in this NDP. This approach is also supported by the WCC environmental and biodiversity report available on the Hallow NDP website.</p>

6	Joy Fulcher	✓	104 <i>" I support Policy HAL15 – The present 'lockdown' has shown a huge increase in walking and cycling. It is important to have leisure cycling routes e.g. Broadheath – Hallow Route and also to improve pedestrian and cycle links within the village and safe cycle ways for travel i.e. to work"</i>	<p>The current NDP draft makes a strong commitment to Public Rights of Way, and to improvement of a cycle route in particular to enable children and families on the east of Main Road (where most recent development has gone) to gain safe access to Main Road, the zebra crossing, shop and school. At present this is part of the developer's commitment to Hallow when developing the preferred option site of Greenhill Lane extension.</p> <p>In the future HPC would hope to pursue a greater length of cycle route and will engage with MHDC and WCC on this issue.</p>
7	Joy Fulcher	✓	72 <i>" Firstly, I would like to say what an excellent document this is. It is full of interesting facts, is clearly written and well illustrated with maps, graphs and photographs. A very useful publication for the Community to fully understand exactly what an NDP can achieve. I support Policy HAL8 – Where appropriate and relevant applicants should be able to demonstrate how new development: a) Maintains Hallow's green infrastructure.</i>	<p>The current NDP draft makes a strong commitment to Public Rights of Way, and to the preservation of Hallow's green infrastructure via green space designation and informed by the WCC environmental and biodiversity report available on Hallow website, and briefing sessions with WCC staff on landscape and biodiversity issues relevant to Hallow. Policy HAL 8 is seen as a critical part of the current NDP draft.</p>

				<p><i>The present 'lockdown' has shown a huge increase in the use of Public Rights of Way in Hallow and should be enhanced and extended where possible. The many PROWs are very much appreciated and have proved a boon in the present situation, their increased use will continue".</i></p>	
8	Andrea Unwin	✓		<p>19 <i>"Since moving into Hallow 42 years ago, the volume of heavy goods vehicles travelling through has increased dramatically – some keeping to the speed limit, many not. This, coupled with the increase in cars and reduction in public transport has already turned a relatively quiet village into a busy highway into and out of Worcester and surrounding districts. Every increase in housing only exacerbates the problem. Over decades, various by-pass schemes have been mooted with no positive action being taken. Until such time that it is, in my opinion, any further expansion of Hallow and surrounding areas would be undesirable".</i></p>	<p>HPC and the NDP draft recognises the volume of traffic through Hallow on the A443. Separately to the NDP Hallow Parish Council has actively pursued traffic calming measures, and the zebra crossing from developer contributions. The NDP process is unable to influence wider infrastructure issues including significant road development.</p> <p>On a broader note, HPC remains concerned that continued allocation of housing west of the river to parishes with limited public transport and lack of major road connectivity produces challenges to local infrastructure and strains sustainability. Representations by HPC on these issues have been and will continue to be made to MHDC under the SWDP revision process.</p>

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9	Anthony Unwin	✓		whole document no comments made	Noted
10	Peter Sweetland	✓		whole document <i>“Policies listed are all laudable, but there is little information as to how these will be implemented and paid for – other than HNDP “encouraging” their adoption”.</i>	Add in paragraph on implementation – planning applications, decision making, private and public funding.
11	Beryl Firth	✓		whole document no comments made	Noted.
12	Graham Firth	✓		27 <i>“Map 5 shows the adopted Hallow Development Boundary. Can residents therefore, be confident that landowners, developers and MHDC Planning Dept. will respect this boundary and that no significant development will be allowed outside it until 2041 at the earliest”.</i>	There are no guarantees. However, Hallow Parish Council has embarked upon an NDP and worked co-operatively with the Local Planning Authority to try and ensure a planned approach to housing allocation in Hallow up to 2041.
13	Mrs G.S. Stinton	✓		whole document no comments made	Noted.
14	Anne Stark	✓		Policy HAL 13 <i>“Although they are outside the conservation area, I suggest that the buildings next to the house known as ‘Jessamine’ be placed on the ‘Other Features’ list along with the Milestone outside the same property. In addition, the Lychgate at Hallow Church is worthy of note”.</i>	These additions will be considered as part of the local listing submission to MHDC.

15	Ann Finn	✓	62 – 7.12 <i>“The draft NDP states ‘no street lighting’. It should more accurately reference the necessary lighting either side of the new zebra crossing that has been added since consultation began”.</i>	This alteration will be made in the next draft version.	
16	Ann Finn	✓	104 – 15 <i>“Whilst valuing the short additional recreational stretch of cycle lane included in the draft NDP I know that a number of respondents expressed the urgent need for cycle lane provision between Hallow and Worcester. This is reflected in the drafts in HAL15ii: Creation of dedicated off road cycle route to Worcester. Since the Covid-19 pandemic, recreational and transport cycling has significantly increased as motor transport has declined. However, Worcester Councillors with responsibility for Highways Alan Amos has been publicly criticised in the national press for describing the increase in cycling as ‘just a phase’ when councils are responding by creating ‘pop-up’ cycle lanes. In the light of the current crisis I feel this policy should be given greater prominence and exploration in Hallow’s NDP.</i>	The current NDP draft makes a strong commitment to improvement of a cycle route in particular to enable children and families on the east of Main Road (where most recent development has gone) to gain safe access to Main Road, the zebra crossing, shop and school. At present this is part of the developer’s commitment to Hallow when developing the preferred option site of Greenhill Lane extension. In the future HPC would hope to pursue a greater length of cycle route and will engage with MHDC and WCC on this issue. The present resurgence of cycling and the need for alternative, greener transport may well form a welcome additional “push” to achieving the wider aim of enhancing cycle routes around Hallow, and ultimately to Worcester City. Whilst these matters are largely	

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				<i>As I write this I observe from my window a mother and two children cycling home to Hallow school safely but illegally using the footway as a Cycle path as so many people do to avoid the fast heavy traffic on the road but inconveniencing pedestrians. In most places the footway could be broadened to safely accommodate dual use. Please share the comment with MHDC and out local councillors”.</i>	outwith the current NDP, Hallow Parish Council recognises their importance and is committed to their active pursuit with the relevant authorities.
17	Christine Neville	✓		whole document “I fully support the site selection as proposed in the N.D.P.”.	Noted.
18	Ronald Poolton	✓		whole document no comment made	Noted
19	Irene Poolton	✓		whole document no comment made	Noted
20	Colin Cartridge	✓		whole document no comment made	Noted
21	Diane Cartridge	✓		whole document no comment made	Noted
22	Janet Payne	✓		whole document no comment made	Noted
23	Roger Payne	✓		whole document no comment made	Noted

24	Paul Wilcox	✓		<p>whole document <i>"I wish to register my 100% support and agreement with the information provided and proposals made by the Hallow Parish Council and NDP Steering Group in relation to the Neighbourhood Development Plan. Having read the plan thoroughly and considered all the implications, I am so encouraged that the data for the consultation has been assembled by such a passionate, dedicated and well informed group of people. What comes across most strongly to me is that, whilst future development is acceptable as inevitable and right, the stewardship and care of all elements of the community is taken very seriously indeed; not only the impact on the geography of the area, but on human and societal elements as well as transport, infrastructure and community life. What I also find heartening is the total willingness to cast vision for the future and then identify smart objectives in the strategy for how we</i></p>	<p>Thank you, your support is appreciated.</p> <p>HPC and Hallow NDP note the support and contribution of many residents and local organisations via the survey, the public information events, and volunteer walkabout surveys and other evidence gathering. This has enabled the NDP to be rooted in local concerns and views, and thanks to these people it does have a really local feel.</p>

				<i>move forward. This really is an excellent piece of work. Admirable”.</i>	
25	Paul Hayes			<p>Comment only on Policy HAL6 <i>“1) Why is all the land owned, or to be owned by the PC not designated as Green Space i.e. Holly Bank, Land North of the Scout Hut. These areas are used extensively by local people and provide an important recreational facility.2) Can Spindle Wood and the wood on the Southern side of Green Lane (opposite to Spindle Wood) be designated as Green Space? The woods are used extensively by local people and provide</i></p>	<p>1) The Land owned by Hallow Parish Council is designated as Recreational Space, a more appropriate designation. This is shown on the policies map as HAL 11. See pp: 87-89 of NDP Draft, para 8.6, and map page 89, additional recreational spaces and facilities are also included.</p> <p>2) Spindle Wood was considered at length and discussed with MHDC</p>

				<p><i>an important facility and needs to be protected”.</i></p>	<p>and consultants Kirkwells. It is excluded on grounds that: it is considered to be an “extensive tract of land” according to NPPF criteria (it is 13.72 hectares); it has current protection and public access via a Forestry Grant although it is in private ownership; it is located at some distance from the centre of Hallow village, near the hamlet of Shoulton; it is outwith any area presently considered for development under the SWDP Rev process. The same considerations apply to the land on the Southern side of Green Lane.</p>
26	Anne Holmes	✓		<p>whole document <i>“There are many things that I like about this plan but my overall comment is that it does well in balancing the tensions between the need for certain types of housing and the opposition to housing, particularly large developments. The preferred site does this in being a smaller site away from the main road which is largely self contained. It’s situation, away from the main road preserves the very visible remaining green space along the road in the centre of the village. Many villagers are against more housing which is why the preservation of green space</i></p>	<p>The current NDP has attempted to balance a further allocation of housing on top of the 131 built since 2016 with protecting important Green Spaces to the village residents, and the protection of landscape and biodiversity as per the WCC report. The “character of Hallow” remains important to many residents as evidenced by the community survey and the public information events. Preservation of key views, PROWS, trees all contribution to the remaining rural character. This is supported by the Design Code for Hallow.</p>

				<p><i>is so important as a counter balance to necessary development. I am aware that some of the anti-development movement in the village but may of the negative comments from this negative group have not recognised that the current development being built in Hallow predates the NDP. Preservation of views, and trees, helps to protect the rural feel as much as possible in the context of a lot of recent new housing. The detailed mapping of views and trees deserves particular praise.</i></p> <p><i>The plan also recognises some of the things that concerned villagers when the survey was done, such as traffic. Although these are out-with the remit of the plan the proposals seek to mitigate the effects, where it can, by supporting off road cycle paths and encouraging people not to use cars”.</i></p>	
27	Paul Clarke	✓		<p>whole document</p> <p><i>“This is a well thought out plan providing a good focus for the future of the village. It is a positive document with an acceptance that the village must move ahead and embrace the need for a reasonable number of new houses while preserving the essential nature of the rural village setting. Coupled with the Design Guide, this should provide a</i></p>	<p>Noted. Significant work has been done on Landscape and character of Hallow. The Design Code, whilst not overly prescriptive, should result in more sympathetic designs and build.</p>

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				<i>clear framework for the future development to benefit all stakeholders, Well done to all concerned</i> ".	
28	David Thorpe	✓		Page 19 Policy 2.17 <i>"Upgrade of footpaths to encourage walking, including the footpath from Shoulton Lane running adjacent to Main Road running behind Hallow School. This area could have conservation benefits"</i> .	The current NDP draft makes a strong commitment to Public Rights of Way. Improvement and enhancements to PROWS per se is outwith the current NDP. However, HPC recognises their importance and this is likely to form a part of HPC's work and liaison with relevant bodies going forward.
29	David Thorpe	✓		Page 12 Policy 2.2 <i>"Maintaining the 'Significant Gap' as a buffer between Hallow and the city is essential to maintaining the character of an established village which already has facilitated significant new housing"</i> .	Hallow Parish Council (HPC) and Hallow NDP Group are committed to maintaining the "Significant Gap" between Hallow and Worcester City. This is one of the biggest wishes of Hallow residents as expressed in public information events and community survey responses.
30	David Thorpe	✓		Page 19 Policy 2.16 <i>"Serious action is required to facilitate safe cycling. There would be significant benefits for all age groups to be able to cycle to the City Centre and local shops including those on the Martlet Turn"</i> .	The current NDP draft makes a strong commitment to improvement of a cycle route in particular to enable children and families on the east of Main Road (where most recent development has gone) to gain safe access to Main Road, the zebra crossing, shop and school. At present this is part of the developer's commitment to Hallow when developing the preferred option site of Greenhill Lane extension. In the future HPC would hope to pursue a greater length of cycle route and will

					engage with MHDC and WCC on this issue.
31	David Thorpe	✓		Page 20 Policy 2.21 <i>“Returning Hallow Village Green to its original area by removing the road would increase the green space. The matter has been under consideration previously and given that the road is used for parking rather than access the proposal appears sound. Houses on the green do have parking outside their properties other than the Alms Houses where a scheme could be included in the overall plan”.</i>	This is not proposed in the current NDP draft and has been considered in the past and rejected-there are significant issues of car parking for Green residents, and a lack of support to make the change, plus also cost which would most likely fall onto the Parish. The current Village Green space is however designated as an important local green space.
32	David Thorpe	✓		Page 19 Policy 2.18 no comment made	Noted.
33	John Jordan Hallow C E Primary School Governing Body	✓		Page 36, HAL 1 The pressure on all communities to accommodate increased housing provision is already well documented. The Hallow Neighbourhood Development Plan represents a well-considered and evidence led approach to meeting the future demand it is required to accommodate. Policy HAL1 represents an effective way of accommodating future demand.	Clarification on Hallow School Admissions policy and the likely impact of additional children and the planned response to additional numbers is welcome.

			<p>Naturally, the ability of Hallow CE Primary School to accommodate future pupil numbers is a consideration which has been raised throughout the development of the Plan and the school has endeavoured to provide clarity on its position throughout the process.</p> <p>Forecasting future pupil numbers is not entirely straightforward and can be influenced by many factors.</p> <p>Hallow School currently has a Published Admission Number of 29, although it is usual for the school to permit a maximum of 30 pupils in any one year group. The maximum number of pupils at the school at any one time is therefore 210. Over recent years this number has tended to be between 190 and 200.</p> <p>In overall terms there remains some existing capacity to accommodate additional demand. However, care must be exercised as there is no consistency</p>	
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			<p>about the year groups in which any vacancies exist.</p> <p>To enable future planning of places, information is provided on the number children in the area who will reach school age over the next 4 years. However, again this must be treated with caution as this number is likely to fluctuate.</p> <p>Regardless of the current level of vacancies, meeting any additional demand will require a careful management of the School's Admission Policy in the first instance. The School's Admissions Policy clearly sets out the preferences for allocating places which are as follows:-</p> <ol style="list-style-type: none"> 1) 'Relevant looked after children' and 'previously looked after children'. 2) Those children who live in the catchment area of the 	
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				<p>school, which is the ecclesiastical parish of Hallow.</p> <p>3) Those children with siblings currently attending Hallow School. In the case of multiple applications from one family into a single year group where only one place remains available, random allocation will be used as a tie-break to decide which child should be admitted. This process will be independently verified.</p> <p>4) Those who practice a Christian (Trinitarian) commitment by attending:</p> <ul style="list-style-type: none"> a. St Philip and St James Church, Hallow b. St Bartholomew's, Grimley or St Martin's in Holt c. Any other C of E Church 	
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			<p>d. Any other Christian Denomination</p> <p>5) Those who demonstrate a special need for admission (e.g. medical, social or physical circumstances). Appropriate evidence would be required including possible professional referral (e.g. from a local authority).</p> <p>6) Children who reside outside the ecclesiastical parish, who live nearest to the school by the shortest straight line distance.</p> <p>Historically the school has admitted children from outside of its catchment area (although some of these may also qualify under other criteria). However, admission of children from within catchment is currently given the highest priority currently able to be given. It is likely therefore that as demand from 'within catchment' increases the number of places available under 3-6 above would reduce. This will give the</p>	
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			<p>School some scope to meet local need in the future.</p> <p>Expansion (or re-location) of the school is a question which has been raised through the consultation process on the development of the Plan. However, in the short term this is unlikely. Classes 3 and 4 are small but expanding them would only create a handful of spaces. Governors have previously considered the possibility of bringing the capacity of those classrooms up to 30 and this is something that will continue to be considered. Ultimately, however, this is unlikely to increase capacity significantly and, at a time of shrinking resources, the costs of doing so would need to be set against the benefits accruing.</p> <p>Re-purchasing the old school house, if it became available, would again offer some additional capacity. However, the costs of this would need to be carefully considered and balanced against the benefits which could accrue.</p>	
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			<p>Extending the existing building would require the identification of more playground space and there is a public footpath which would be affected. Diverting a footpath not a straightforward process.</p> <p>Ultimately though, affordability is a key consideration. It is unlikely that the school could afford to relocate at this given time. Land availability and costs involved are likely to be prohibitive. Added to this, the school would need to demonstrate that it is unable to meet the demands of the local community over a prolonged period before re-location or significant expansion would get the necessary level of external support.</p> <p>Suffice to say that in the short term the School and its Governors are likely to be looking towards an effective management of its Admissions criteria</p>	
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			<p>as a means of meeting local demand for places.</p> <p>Clearly if demand from the local community became unmanageable in the future there would be a need to look at other ways of meeting demand. This may involve expansion or re-location.</p>	
34	John Jordan Hallow C E Primary School Governing Body	✓	<p>Page 75, HAL 9</p> <p>Governors of Hallow C E Primary School support the Biodiversity measures which are encapsulated within Policy HAL9.</p> <p>In addition to the providing residents of new dwellings with information on the biodiversity features integrated into new housing development Governors will continue to actively consider opportunities for pupils at the school to understand and promote the much appreciated biodiversity of the area in which it is located.</p>	Noted.

<p>35</p>	<p>John Jordan Hallow C E Primary School Governing Body</p>	<p>✓</p>	<p>Page 104, HAL 15</p> <p>The provision and promotion of sustainable forms of transport as set out in Policy HAL15 is wholeheartedly supported by Governors at Hallow CE Primary School.</p> <p>The School is located on the busy A433 through the village and a large number of pupils access and exit the school onto the narrow footpath alongside this road at various times of the day.</p> <p>The promotion of alternative (and sustainable) methods of transport will be a key factor in managing on street parking in the vicinity of the school at key times. The overarching principle that new development should seek to reduce reliance on the private car and increase opportunities for active travel (use of public transport, walking and cycling) by incorporating measures that improve facilities, infrastructure and the environment for pedestrians, cyclists, public transport and its users is also a welcome principle that will greatly contribute to pupil safety as well as their health and well-being.</p>	<p>HPC and the NDP draft recognises the volume of traffic through Hallow on the A443. Separately to the NDP Hallow Parish Council has actively pursued traffic calming measures, and the zebra crossing near the School from developer contributions.</p> <p>The current NDP draft makes a strong commitment to improvement of a cycle route in particular to enable children and families on the east of Main Road (where most recent development has gone) to gain safe access to Main Road, the zebra crossing, shop and school. At present this is part of the developer’s commitment to Hallow when developing the preferred option site of Greenhill Lane extension.</p> <p>In the future HPC would hope to pursue a greater length of cycle route and will engage with MHDC and WCC on this issue. The present resurgence of cycling and the need for alternative, greener transport may well form a welcome additional “push” to achieving the wider aim of enhancing cycle routes around Hallow, and ultimately to Worcester City. Whilst these matters are largely outwith the current NDP, Hallow Parish Council recognises their importance and</p>
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					is committed to their active pursuit with the relevant authorities.
36	Michael Ganner	✓		Page 36 Policy HAL1 <i>“ Keeping development within Hallow village rather than ‘extending’ the village is an important Consideration hence Green Hill Lane is by far the better option.”</i>	Noted.
37	Michael Ganner	✓		Page 75 Policy HAL9 <i>“ Keeping development within Hallow village rather than ‘extending’ the village is an important Consideration hence Green Hill Lane is by far the better option.”</i>	Noted.
38	Michael Ganner	✓		Page 72 Policy HAL8 <i>no comment made</i>	Noted.
39	Michael Ganner	✓		Page 68 Policy HAL7 <i>no comment made</i>	Noted.
40	Michael Ganner	✓		Page 63 Policy HAL6 <i>no comment made</i>	Noted.
41	Michael Ganner	✓		Page 62 Policy HAL5 <i>no comment made</i>	Noted.
42	Michael Ganner	✓		Page 55 Policy HAL4 <i>no comment made</i>	Noted.

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43	Doreen and Michael Jeeves	✓		<p>whole document</p> <p><i>“Both Doreen and I would to thank you for all the work and skill you and your team have given to the Neighbourhood Development Plan. Hallow is very fortunate to have someone of your calibre in charge of this. We believe that the overall plan secures the essence of Hallow for the future as much as it possibly can, given that we are required to accept the number of new homes that have already been allocated.</i></p> <p><i>With regards to the land adjacent to our house, we understand that the current proposal is that this would be designated land for community use. Is it proposed that it be maintained by the Parish Council, the developers or another body? “</i></p>	<p>Supporting comment noted.</p> <p>Parish Council to reply on issue of future maintenance.</p>
44	Geoffrey Munslow		✓	<p>Page 42 HAL1</p> <p><i>“ The proposed development will further increase the need for places at Hallow School – already over subscribed – with no plans to accommodate the extra demand Access to the site is too close to Greenhill Lane, Browns Way and the heavily used layby at Ladygo stores.”</i></p>	<p>Comment noted. No change.</p>
45	J.E. Marson	✓		<p>whole document</p>	<p>Noted.</p>
46	Mrs G. Marson	✓		<p>whole document</p>	<p>Noted.</p>

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47 - 54	Claremont Planning acting on behalf of Mactaggart and Mickel Ltd.			See Table 3	

Table 3. Hallow Neighbourhood Development Plan – Regulation 14 Responses (Claremont Planning) and Recommended Action

Comment Number	Name of Respondent	Support	Oppose	Pages Commented on	Parish Council Response
	Claremont Planning acting on behalf of Mactaggart and Mickel Ltd.	✓		<p>Page 46, paras 6.16-6.19</p> <p>Claremont Planning provides representations to the Hallow NP Regulation Draft on behalf of Mactaggart and Mickel Ltd who control land within Hallow Parish that is being allocated for housing through the Neighbourhood Plan. These representations are submitted with respect to this context and the future delivery of the site’s development through the resulting NP Allocation.</p> <p>Policy HAL2 Housing Need rightly identifies that Hallow requires</p>	<p>The NDP housing needs reflect housing need in Hallow Parish and those of the broader SWDP area and have been informed by parish survey, and by the evidence review performed for the SWDPRev which both consider housing need up to 2041. These should inform tenure and size type, although the downsizing requirements of an older population do remain specific local requirements (Census Data identifies that Hallow has one of the oldest populations in Worcestershire; and the Community Survey identifies this need).</p> <p>On Covid 19, despite a recent limited survey by Right Move there is no long-term trend data from an independent source such as the ONS to support any conclusions that increased home working will necessarily be sustained by the present specific conditions arising from Covid 19, or how market conditions and housing needs may change up to 2041.</p> <p>In addition, the primary role of the NDP is to provide for parish led need, and the broader housing needs identified by the LPA for the SWDPRev. It is not necessarily to provide for any potential “urban flight” arising from Covid 19, or for any speculated changes in market conditions or needs that are, as yet, unsupported by any long-term independent data. In addition, Rightmove July 2020 notes housing market still robust, including for WR2: https://www.rightmove.co.uk/news/house-price-index/</p>

			<p>housing to fulfil local housing needs, separate to previous or possible future strategic allocations. The documented local housing needs provides a sound evidence base to provide new housing allocations at the village. Policy HAL2 will be effective in ensuring that all housing delivered at the village will seek to address local housing needs, particularly in relation to affordable housing requirements.</p> <p>Paragraphs 6.16 – 6.19 refer to the housing need surveys and evidence base that has informed the NP and led to the Policy HAL2 and housing allocations. Although the current demand for downsizing is documented the future housing needs of the</p>	<p>It should also be noted that Broadband speeds and connectivity in Hallow are regarded as poor by residents (see community survey), as is mobile phone coverage. Both would require improvement to sustain long-term, high volume home working-as indicated by recent difficulties during lockdown.</p> <p>Any potential developer of the site may wish to consider what facilities and amenities they would install to new homes to support home working if they consider this a significant issue.</p> <p>There is no evidence at the present time that COVID19 has had or will have a long-term impact on the housing market. Nor that more homeworking has an impact on house types etc. No change.</p>
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				<p>parish must also be considered to provide a sustainable housing supply that addresses the needs of new families who are locating close to the village primary school. The expectations arising from lock-down living as a result of COVID 19 and increased ability to work from home must also be taken into account and not overly constrain housing size.</p> <p>Claremont Planning would recommend improving the advice provided with reference to changing housing demands and market conditions borne out of the COVID19 lock down and changing working practices.</p>	
	Claremont Planning acting on	✓		Page 45, HAL 2 Claremont Planning provides representations	

	<p>behalf of Mactaggart and Mickel Ltd.</p>		<p>to the Hallow NP Regulation Draft on behalf of Mactaggart and Mickel Ltd who control land within Hallow Parish that is being allocated for housing through the Neighbourhood Plan. These representations are submitted with respect to this context and the future delivery of the site's development through the resulting NP Allocation.</p> <p>Policy HAL2 Housing Need rightly identifies that Hallow requires housing to fulfil local housing needs, separate to previous or possible future strategic allocations. The documented local housing needs provides a sound evidence base to provide new housing allocations at the village. Policy HAL2 will be</p>	
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			<p>effective in ensuring that all housing delivered at the village will seek to address local housing needs, particularly in relation to affordable housing requirements.</p> <p>The reference to housing schemes meeting the identified housing needs from the SHMA is welcomed, acknowledging that residential development should deliver housing for new residents as well as those housing requirements of existing residents.</p> <p>The supporting paragraph 6.15 is welcomed in respect of its support for focused housing provision alongside taking into account market requirements. Equally the support for allocation</p>	<p>On Covid 19, despite a recent limited survey by Right Move there is no long-term trend data from an independent source such as the ONS to support any conclusions that increased home working will necessarily be sustained by the present specific conditions arising from Covid 19, or how market conditions and housing needs may change a result of Covid 19.</p> <p>The primary role of the NDP is to provide for parish led need, and the broader housing needs identified by the LPA for the SWDPRV. In addition, Rightmove July 2020 notes housing market still robust, including for WR2: https://www.rightmove.co.uk/news/house-price-index/</p>
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				<p>HAL1/1 is welcomed with regard to the ability of the allocation to provide a range of different house types. Claremont Planning would recommend improving the advice provided in paragraph 6.15 with reference to changing housing demands and market conditions borne out of the COVID19 lock down and changing working practices.</p>	
	<p>Claremont Planning acting on behalf of Mactaggart and Mickel Ltd.</p>	<p>✓</p>		<p>Page 36, Obj 1</p> <p>Claremont Planning provides representations to the Hallow NP Regulation Draft on behalf of Mactaggart and Mickel Ltd who control land within Hallow Parish that is being allocated for housing through the Neighbourhood Plan.</p>	<p>Noted</p>

				<p>These representations are submitted with respect to this context and the future delivery of the site’s development through the resulting NP Allocation.</p> <p>Support is provided to Objective 1 with respect to its intention to meet the housing needs of Hallow through housing allocations that will deliver a mix of housing and provide the opportunity to meet local housing needs. The objective is recognised as providing a longer term approach to development delivery at hallow that is in accordance with the National Planning Policy Framework, whilst accepting the localised housing requirements that exist.</p>	
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	<p>Claremont Planning acting on behalf of Mactaggart and Mickel Ltd.</p>	<p>✓</p>	<p>Page 41, para 6.14 Claremont Planning provides representations to the Hallow NP Regulation Draft on behalf of Mactaggart and Mickel Ltd who control land within Hallow Parish that is being allocated for housing through the Neighbourhood Plan. These representations are submitted with respect to this context and the future delivery of the site's development through the resulting NP Allocation.</p> <p>Support is provided to Objective 1 and the housing allocation HAL1/1 – Land at Green Hill Lane, which is proposed through Policy HAL1 to meet the housing requirements up to 2041. Mactaggart and Mickel Ltd would also like to confirm that</p>	
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			<p>paragraph 6.14 accurately records the collaboration that has taken place with the Neighbourhood Plan Forum. late the site selection and assessment process that has been followed, including the submission of additional information by Claremont Planning to identify shortcomings in the SWDP Site Selection Assessment and providing confirmation that the HAL1/1 site was developable despite there being a gas main to the south of its extent.</p> <p>Through input into the NP's preparation and liaison with the SWDP Policy Team, acknowledgement of the wrongful assessment of the site now proposed for allocation was confirmed. This has been</p>	<p>HPC and NDP SG understand the caution and limitations indicated by Claremont Planning in their response and will work collaboratively with Claremont planning to clarify the cycle route and more accurate wording for the next iteration of the NDP.</p> <p>Attention is drawn to the volume of positive comments made about the proposed cycle route improvement.</p>
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			<p>appropriately reported in the NP text and explains the allocation of HAL1/1 in favour of alternative site options.</p> <p>Claremont Planning would seek to clarify however that the bullet referencing agreement of the cycle route is not accurate with respect to the allocation only being able to provide such a route over the land that it contains; whilst development of adjacent lands has been subject to separate determined applications. Clarification of this point would be appreciated to ensure that the limitations of what the allocation can provide are understood.</p> <p>The Masterplan referenced in Para 6.14 (page 42) is supported as representing the</p>	
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				<p>indicative parameters by which the proposed allocation can be delivered. This masterplan at Map 8 identifies the necessary separation to the gas main and maintenance of the related easement through the location of public open space. It also direct vehicular access through from the adjacent residential development that has been permitted, whilst linking to delivered housing development to the south. The Masterplan demonstrates how the proposed allocation HAL1/1 will deliver a third phase of eastern expansion to the village which represents a comprehensive approach to village expansion.</p>	
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	<p>Claremont Planning acting on behalf of Mactaggart and Mickel Ltd.</p>	<p>✓</p>	<p>Page 36, HAL 1</p> <p>Claremont Planning provides representations to the Hallow NP Regulation Draft on behalf of Mactaggart and Mickel Ltd who control land within Hallow Parish that is being allocated for housing through the Neighbourhood Plan. These representations are submitted with respect to this context and the future delivery of the site’s development through the resulting NP Allocation.</p> <p>Support is provided to Objective 1 with respect to its intention to meet the housing needs of Hallow through housing allocations that will deliver a mix of housing and provide the opportunity to meet local housing needs. The</p>	
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			<p>objective is recognised as providing a longer term approach to development delivery at hallow that is in accordance with the National Planning Policy Framework, whilst accepting the localised housing requirements that exist.</p> <p>Related to the support of Objective 1 is confirmation of the appropriateness of the housing allocation HAL1/1 – Land at Green Hill Lane, which is proposed through Policy HAL1 to meet the housing requirements up to 2041. The proposed allocation site is currently laid to arable farming land and is characterised by a gentle, flat topography that is bounded by Greenhill Lane to the north and by</p>	<p>Final housing numbers for Hallow Parish NDP are still being finalised under the SWDPrev process but are likely to be a minimum of 40 and a maximum of 49. HPC and NDP SG have requested MHDC to update the evidence base to more accurately reflect permissions and builds in Hallow since SWDP 2016, and to provide clarification on the counting method used. HPC expects to agree and finalise a housing need allocation for both the SWDPrev and Hallow NDP by Reg 16. HPC and NDP SG will work collaboratively with both MHDC and Claremont Planning to finalise this. Hallow Parish Council welcome the commitment to address the specific requirements of downsizing.</p>
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			<p>a bridleway track to the east, whilst separated by hedgerows from recent development to the south. Mactaggart and Mickel Ltd control the land proposed to be allocated as HAL1/1 and have promoted it for consideration to the Hallow NP and SWDP .</p> <p>The proposed allocation policy is therefore supported although it would be preferable for the development quantum to be described as 'Up to 50 dwellings' instead. The identification of a maximum housing threshold is promoted as being more realistic and offering the NP a more flexible route of delivering a mix of smaller properties that are more likely to address the identified</p>	
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			<p>housing needs, particularly in respect of homes for those existing residents that are down-sizing.</p> <p>The location of HAL1/1 rightly follows the previous directions of housing growth that have been allocated and identified at Hallow through the SWDP, recognising the relatively unconstrained nature of the eastern areas of the village. The new allocation will consolidate this growth area up to an identifiable boundary that is demarked by Greenhill Road and related bridleway track.</p> <p>Claremont Planning can confirm on behalf of Mactaggart and Mickel Ltd that highway access has been secured</p>	<p>HPC and NDP SG understand the caution and limitations indicated by Claremont Planning in their response and will work collaboratively with Claremont planning to clarify the cycle route and more accurate wording for the next iteration of the NDP.</p>
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				<p>through the adjacent SWDP59zzi allocation and that the site can be developed effectively whilst respecting the necessary easement to the gas main that is located to the south of the site. The masterplanning of the site has identified that it will be possible to provide a route through from adjacent lands to the east to connect to the Broadheath Hallow Cycle Loop. The NP should recognise however that delivery of improvements on lands beyond the allocation extent are not within the control of Mactaggart and Mickel Ltd or the landowner.</p>	
	Claremont Planning acting on behalf of	✓		Page 36, obj 2	

	Mactaggart and Mickel Ltd.				
	Claremont Planning acting on behalf of Mactaggart and Mickel Ltd.	✓		<p>Page 37-38 paras 6.1-6.7</p> <p>Claremont Planning provides representations to the Hallow NP Regulation Draft on behalf of Mactaggart and Mickel Ltd who control land within Hallow Parish that is being allocated for housing through the Neighbourhood Plan. These representations are submitted with respect to this context and the future delivery of the site's development through the resulting NP Allocation.</p> <p>Support is provided to Objective 1 and the housing allocation HAL1/1 – Land at Green Hill Lane, which is proposed through Policy</p>	Noted.

			<p>HAL1 to meet the housing requirements up to 2041. Mactaggart and Mickel Ltd would also like to confirm that the paragraphs 6.1 – 6.7 accurately relate the site selection and assessment process that has been followed, including the submission of additional information by Claremont Planning to identify shortcomings in the SWDP Site Selection Assessment and providing confirmation that the HAL1/1 site was developable despite there being a gas main to the south of its extent.</p> <p>Through input into the NP’s preparation and liaison with the SWDP Policy Team, acknowledgement of the wrongful assessment of the site now proposed for allocation was</p>	
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				confirmed. This has been appropriately reported in the NP text and explains the allocation of HAL1/1 in favour of alternative site options.	
	Claremont Planning acting on behalf of Mactaggart and Mickel Ltd.			<p>Page 15, MAP 4 Claremont Planning provides representations to the Hallow NP Regulation Draft on behalf of Mactaggart and Mickel Ltd who control land within Hallow Parish that is being allocated for housing through the Neighbourhood Plan. These representations are submitted with respect to this context and the future delivery of the site's development through the resulting NP Allocation.</p> <p>The Development Boundary map for Hallow presented on Page 15 through Map 4 is not</p>	<p>Amend paragraph 2.4 to stress this is the development boundary as shown in the development plan. The HNDP does not seek to review this boundary. Map 4 cannot be amended, as it a statement of fact i.e. what is in the development plan.</p>

			<p>explained appropriately through supporting paragraphs in terms of whether it represents the current village extent, policy position or proposed boundary. In order to provide clarification of this for readers, this should be better explained at paragraph 2.4 in terms of current policy definition of the village boundary.</p> <p>To ensure that the boundary map is logical however it is suggested that Map 4 be amended to show the boundary extended to the east to include constructed development at Orchard Close as illustrated by Map 6. Map 4 would then show a village boundary extent that combines the recognised permissions and allocations recorded by</p>	
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				<p>Maps 5 and 6. This would enable the reader to better understand the existing village extent, how it has been influenced through planning permissions and the South Worcestershire Development Plan and how it will be affected through proposed NP Allocations. This would also avoid confusion in respect of allocations that are proposed through the NP and those that exist and are established through the SWDP process.</p>	
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Table 4. Hallow Neighbourhood Development Plan – Regulation 14 Responses (Barton Willmore) and Recommended Action

Braemar/Barton Willmore Objections

Objection	Parish Council Response
<p>Policy HAL1 – New Housing Development in Hallow Village 2021-2041</p> <p>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.</p> <p>Paragraph 6.6 of the supporting text to Draft Policy HAL1 states:</p> <p style="text-align: center;">“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.”</p> <p>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.</p> <p>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</p>	<p style="color: red;">Based on current evidence from the emerging SWDPR the allocation will meet the indicative housing figure. This position will be kept under review.</p> <p style="color: red;">The housing figure in the HNDP is based on the indicative housing figure provided to the PC by the South Worcestershire Councils. No change.</p> <p style="color: red;">Based on the indicative housing figure there is no need to allocate further land.</p>

Hallow Neighbourhood Development Plan Consultation Statement, December 2020

Objection	Parish Council Response
<p>Plan Period. Draft SWDPR Policy 55 goes on to outline a preferred allocation at Land Lying South of Tinkers Coppice Farm for 49 dwellings.</p> <p>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.</p> <p>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).</p> <p>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.</p> <p>Paragraph 29 of the National Planning Policy Framework (NPPF) states:</p>	<p>This is based on the work of the South Worcestershire Councils – no change.</p> <p>No change. HNPP does not promote less development than in strategic policy.</p> <p>Noted. No change.</p>

Objection	Parish Council Response
<p>“Neighbourhood Plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies”.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>The site has been allocated to meet the indicative requirement and has been discussed and agreed with the South Worcestershire Councils. No change.</p> <p>The position will be kept under review, should this change as the HNDR is being prepared the HNDR will be amended accordingly. No change at the present time.</p>

Objection	Parish Council Response
<p>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.</p>	
<p>Policy HAL2 – Housing Need</p> <p>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:</p> <ul style="list-style-type: none"> • Affordable housing (particularly 1 bedroom social rented dwellings) • Affordable and open market 1 and 2 bedroom dwellings • Bungalows of different tenures <p>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.</p>	<p>Comment noted. No change.</p>
<p>Policy HAL 7 – Important Views</p> <p>Draft Policy HAL7 seeks to protect key views and development proposals must be sited so that they do not harm these views.</p> <p>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</p>	<p>Views evidence has been reviewed and includes more accurate mapping of range and extent of views, and a full appendix covering each view is now incorporated into NDP. Conservation Area document is not “outdated”.</p>

Objection	Parish Council Response
<p>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.</p> <p>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.</p> <p>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.</p>	
<p>Policy HAL8 – Green Infrastructure</p> <p>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.</p> <p>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.</p>	<p>The HNBP has an extensive evidence base. The site forms part of the neighbourhood area's GI network. No change.</p>

Objection	Parish Council Response
<p>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.</p> <p>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.</p> <p>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.</p> <p>The landscape-led development proposed in the Vision Document would satisfy the draft Policy's requirements, namely:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>	

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4.0 Strategic Environmental Assessment/Habitat Regulations Assessment (March 2019)

4.1 In preparing the Hallow Neighbourhood Development Plan, the HNDP has been subject to Strategic Environmental and Habitat Regulations Assessment screening by Malvern Hills District Council - <https://hallowndp.co.uk/wp-content/uploads/2020/06/SEA-HRA-Screening-Opinions-February-2020.pdf>.

4.2 The screening has been consulted on with the relevant statutory bodies. The screening concluded:

“The SEA screening exercise featured in Section 2 concludes that the draft Hallow Neighbourhood Plan may require a full Strategic Environmental Assessment to be undertaken. This is because the Neighbourhood Plan proposes a land allocation for development adjacent to an existing allocation in the SWDP.”

4.3 The screening also concludes:

“The HRA screening exercise featured in Section 3 concludes that the draft Hallow Neighbourhood Plan does not require a full Habitats Regulation Assessment Appropriate Assessment to be undertaken. There are no internationally designated wildlife sites within the Hallow Neighbourhood Area, with Lyppard Grange SAC and Bredon Hill SAC falling within a 20km radius. The impact on these sites as a result of the land allocations contained within the SWDP has been assessed in the SWDP HRA AA, and although the draft Hallow Neighbourhood Plan does deviate, the level of such allocations are considered small enough to conclude that it is unlikely to have a negative impact on any internationally designated wildlife sites and as such, the recommendation is made that a full AA is not required.”

Appendices

Appendix 1. BUILT ENVIRONMENT AND HERITAGE ASSET WALKABOUT METHODOLOGY HALLOW NDP

Initial desk research was carried out comprising:

- Worcestershire Archive and Archaeology Service Monument Report (2013, updated 2018)
- MHDC 'Buildings of Merit' document
- Listed buildings list for Hallow
- Hallow Local History Archive compiled by Hallow History group.
- MHDC Conservation Area Report
- WCC 'Your Place Matters Toolkit'
(http://www.worcestershire.gov.uk/downloads/file/7506/your_place_matters_toolkit).

Further work was commissioned from Worcestershire Archive and Archaeology Service in 2019 resulting in a full Historic Environment Search (available at: <https://hallowndp.co.uk/wp-content/uploads/2019/06/Historic-search-Hallow-Final120619.pdf>).

Background work was also conducted by Hallow History Group to identify buildings in Hallow worthy of non-designated asset status, utilising historical search methods and archive material to provide historical details on the buildings.

A walkabout to survey the built environment of Hallow using 'Your Place Matters Toolkit' was organised in November 2018. The day also benefitted from the advice of Martley village NDP lead and Locality Champion (see power point below).

Forty volunteers were used from across the village, including Hallow History Group members, Hallow Community Group and Parish Councillors. Five groups surveyed pre-arranged routes around the village using the following zone map. This zone map was later amended by AECOM in Design Guide, page 14 (available at: https://hallowndp.co.uk/wp-content/uploads/2019/10/Hallow-Design-Guide_2.pdf

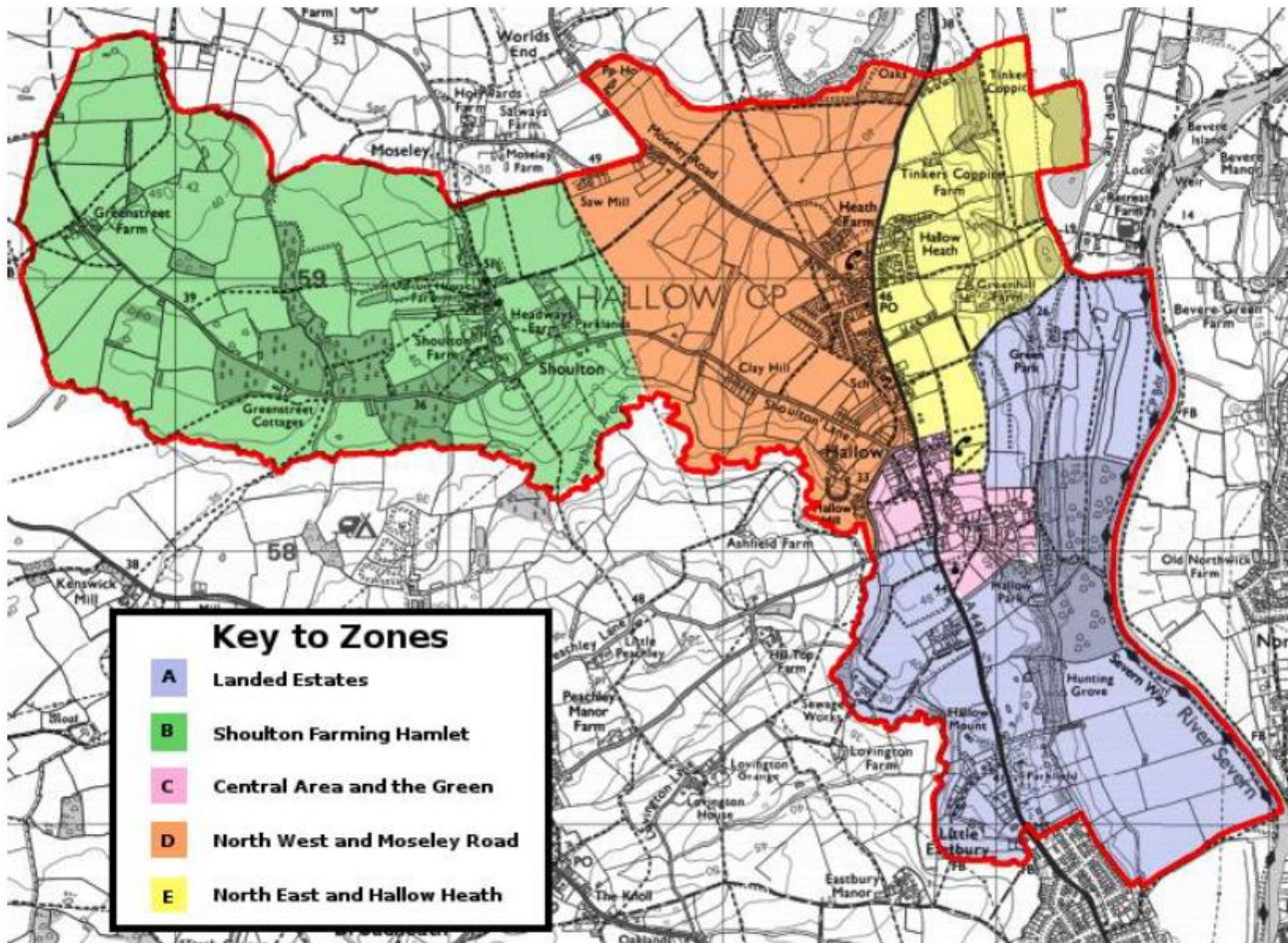
Each group had a member of Hallow History Group in it, and wherever possible someone with town planning or architectural experience. The groups were required to complete a survey form (Appendix 1) based on 'Your Place Matters Toolkit' (and where possible the group lead had some relevant background or occupational experience). Photographs were also taken and recorded. The survey sheets were collated by the NDP Steering Group including two members of Hallow History Group. The results were shared at public information events and villagers' views sought. Survey forms are available on request from hazelkemshall@gmail.com

The survey material and photographs were then passed to AECOM as part of their Design Guidance work for their independent assessment of Hallow village. They restructured the 5 zones (see page 14 of their report) and have presented their overview of Hallow village according to these zones, utilising in large part the survey forms and photographic record.

The Hallow NDP built environment work and heritage asset survey has contributed to the NDP in the following ways:

- Provided evidence for the inclusion of heritage assets onto the MHDC non-designated asset list.
- Provided evidence and photographs for the AECOM independent assessment of Hallow's built environment and character.

Hallow NDP Zone Map



GROUP A - HALLOW VILLAGE SURVEY - LEADER _____

Buildings and their Settings

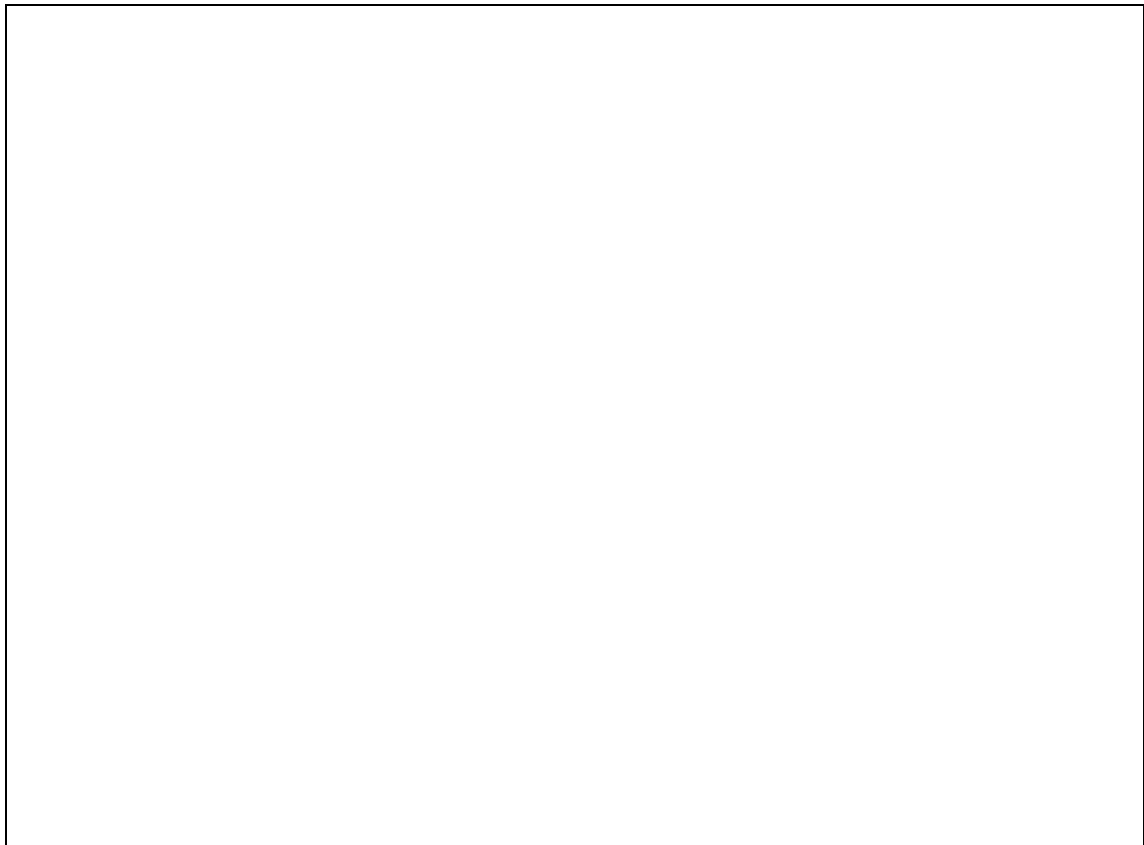
1. What are the key characteristics of buildings in your area?

Are the buildings roadside or set back within their plots? This may differ building by building or street by street. Consider broad characteristics such as type, scale, massing/density, height in storeys, orientation (sideways on to road, back to back, etc.) What materials are used? – Bricks, tiles, slates, timber. Are there decorative features in the brickwork or particular style of door, gables, windows or chimneys?

Take illustrative photos carefully recording the photo number/s on the grid provided, noting the property and angles the photo was taken. Record all details below.



2. Does the area contain buildings of the same date, type or form, or is the area a mixture of buildings and styles. Identify the differing styles if you can.




3. How do buildings relate to other key features of the landscape, such as the geology? e.g. do they follow along a ridge, top of a hill, down a slope? How do they fit into the wider landscape?

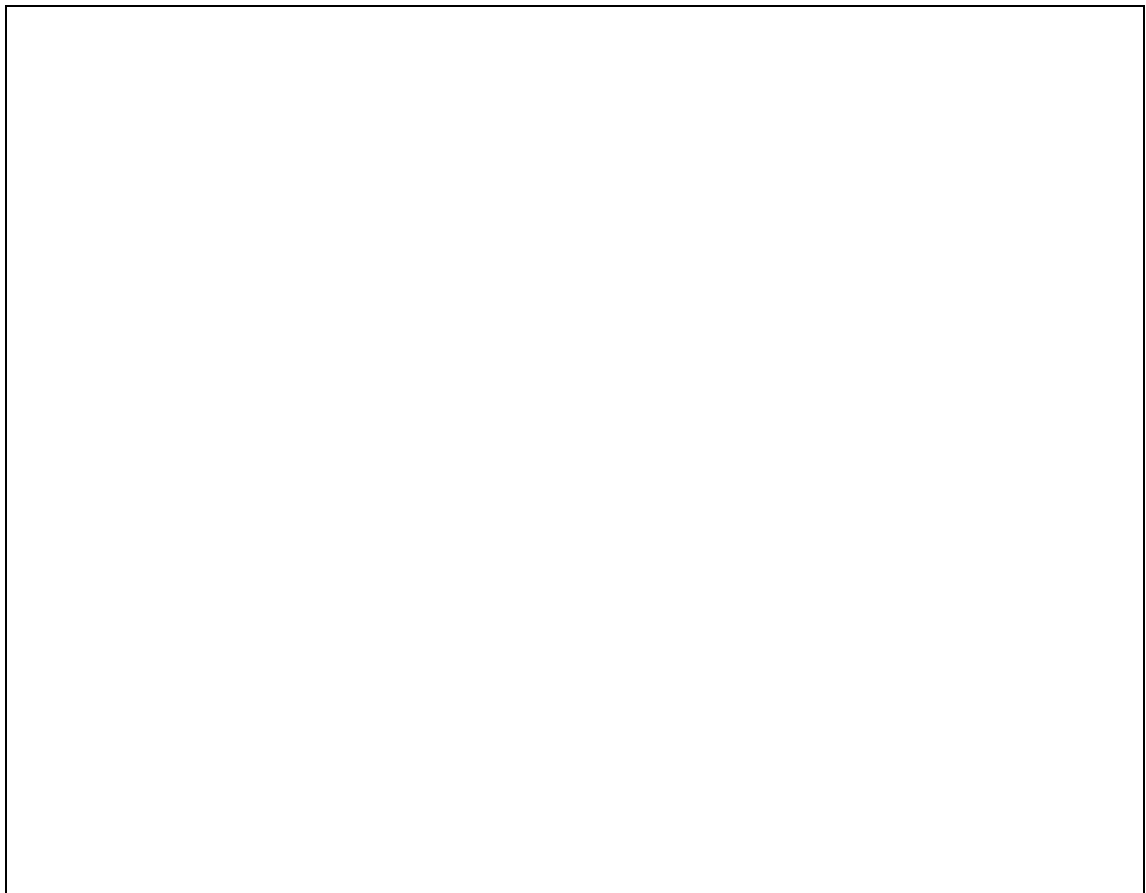


4. Has the area developed over time, if so, what have been the major changes?

5. What further historical information would be useful?



6. Do the buildings make a positive, neutral or negative contribution to the character and distinctiveness of the parish/village?

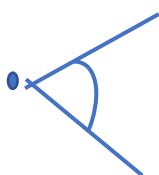


7. Are any buildings/groups of buildings in the area considered to have special significance and why? List them and identify where they are. Take photographs and record carefully, answer below recording location.

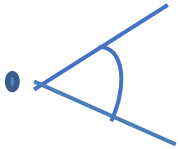
8. How does any 'street furniture' such as letter boxes, telephone boxes, wells, memorials, signage, contribute to the character of the area? List and identify carefully the location of each. Take photographs and record.



9. Are there any landmark buildings within the area, or any landmark buildings that can be seen from it? Detail what of interest or significance you can see and from where (e.g. the church; Hallow school spire; landscape or buildings features in the distance) Record carefully and take photographs. Please use the following symbol on the map (the dot is where you are standing)



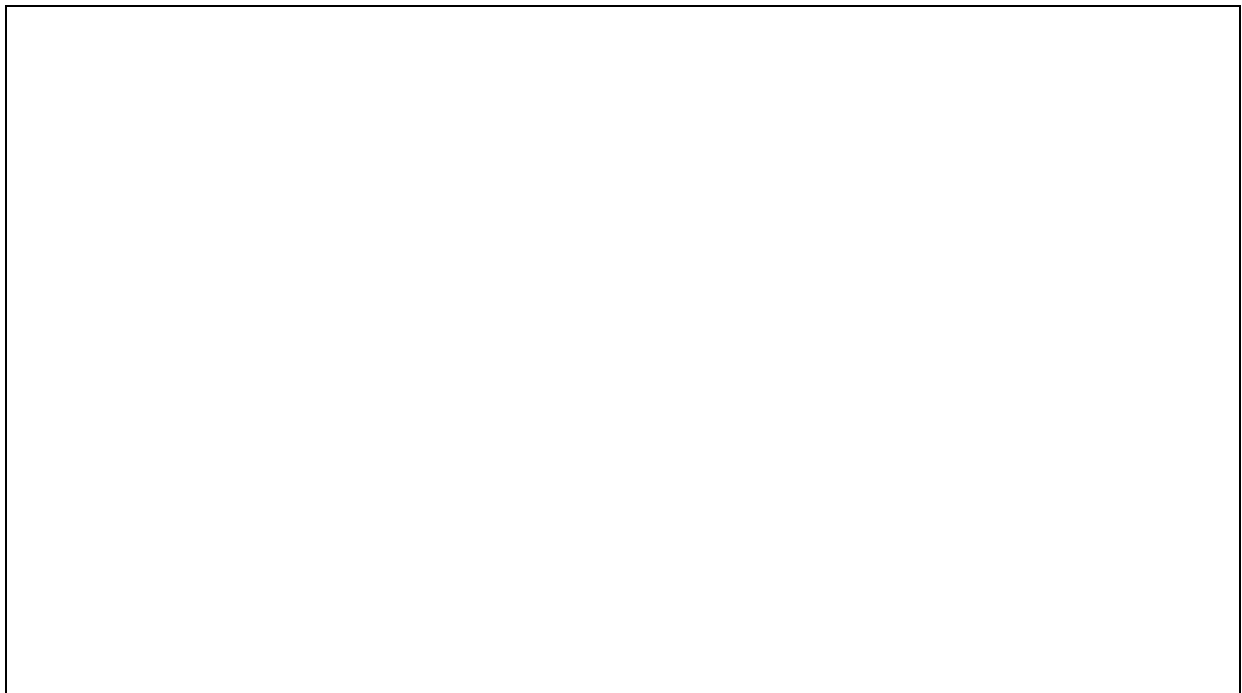
10. Are there any special views looking into or out of or through the area?
Has a particular building or a group of buildings been built on the site to be seen and experienced? Please photograph and mark each photo on the map using the symbol.



11. Boundaries. Can you see hedges, fences or walls. Are they functional, decorative or both? Identify the hedging and comment on the age, type and material used for walling. Are there any notable landscaping features, e.g. verges, borders or trees? Photograph and record.

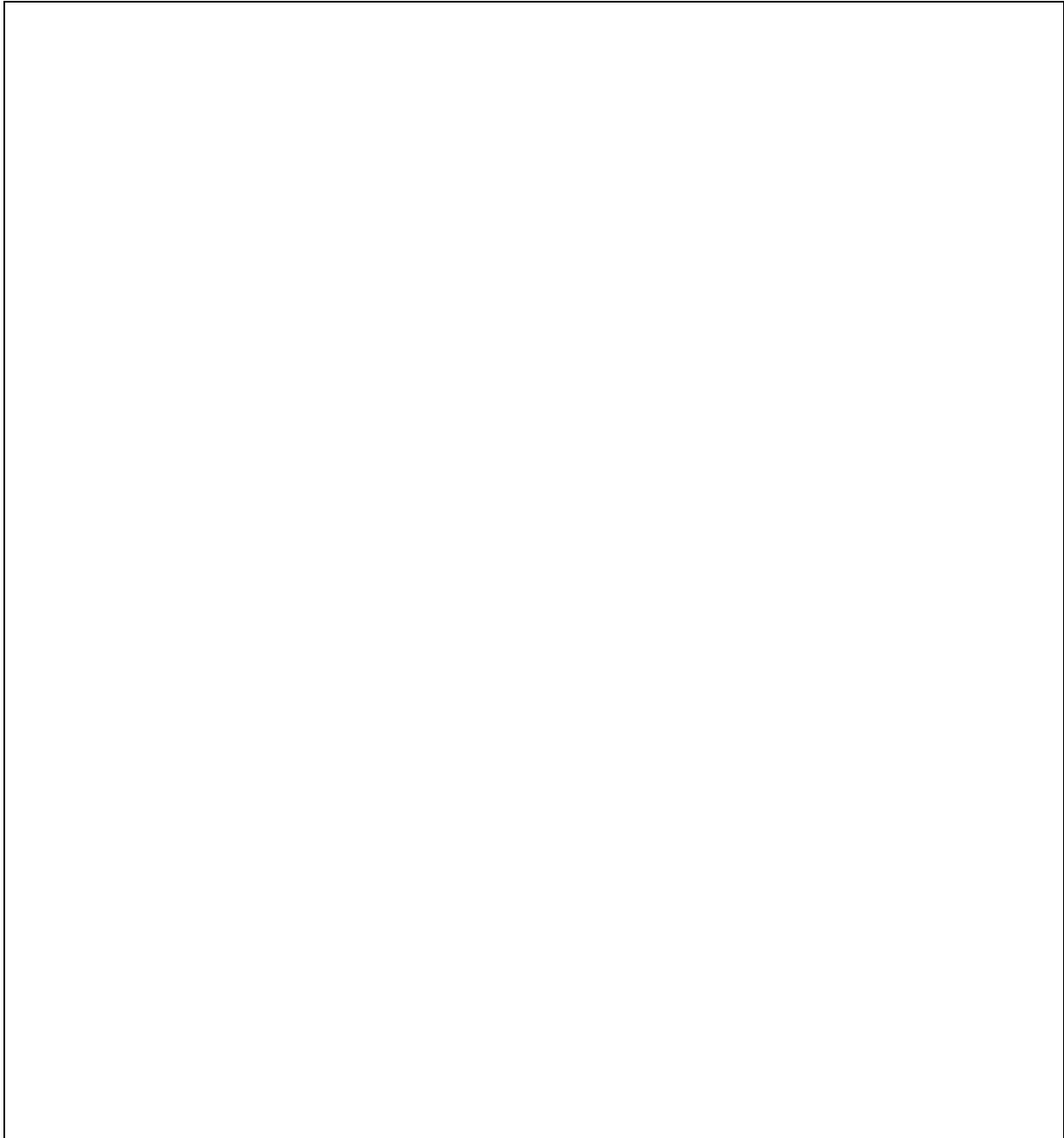


12. Listed Buildings Please tick listed buildings on the list provided and identify any non-listed building of historical interest or merit, in addition to those on your list. Please say why they should be considered as a significant historical asset for the village. Photograph and record carefully.



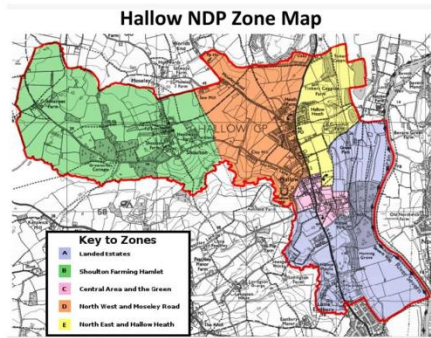
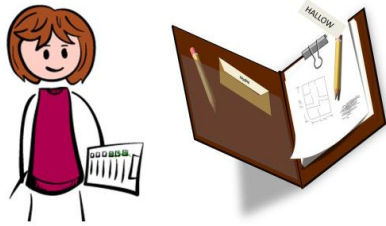
OVERALL CONCLUSION

What overall conclusion have you drawn about the general character of the area? If you want to back up your comments with photographs, please record fully with any additional helpful details.

A large, empty rectangular box with a thin black border, intended for the respondent to provide their overall conclusion and supporting details. The box is currently blank.

<p style="text-align: center;">Welcome to the Walkabout Survey Day</p> <p style="text-align: center;">Hazel Kemshall hazelkemshall@gmail.com 01905 641 632</p> 	<p style="text-align: center;">Aim of the Walkabout</p> <ul style="list-style-type: none"> • To identify and confirm Listed Buildings • To identify other buildings and assets of historical importance to village • To identify the buildings, setting and landscape that makes Hallow... Hallow.
<p>Thanks to...</p> <ul style="list-style-type: none"> • Members of Hallow History Group who will bring their vast knowledge to the walkabout survey • Our group leads who have relevant expertise • YOU!!!! You bring your knowledge of the village, your time and interest • And Stuart Cumella from Martley Parish Council who has done it before. 	<p>Why a sense of place is important</p> <ul style="list-style-type: none"> • What is a “sense of place” and why is it important? • The role of “place and design guidance” in local planning and what your village looks like in the future • The benefits of design guidance • The negatives of design guidance if you do not have it • BUT design guidance MUST be based on evidence of what your village looks like now
<p>What we did in Martley</p> <ul style="list-style-type: none"> • Identified key architectural features- so look up, at, and closely • Key buildings and historical assets-use your local expertise • Taking good photos • Be as comprehensive as you can • Painting a picture of the village-bearing in mind it is not all the same! 	<p style="text-align: center;">Examples from Martley</p> 
<p>Features of Buildings</p> 	<p>Not just buildings</p> 

So good luck today



**ZONE A
PARKLAND
LANDED
ESTATES**



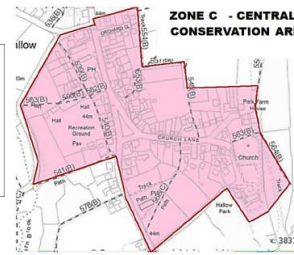
- ZONE A – GROUP**
- Ingles Thomson – [Lead, survey form]
 - Ann Finn [History]
 - Ann Holmes [camera]
 - Alison Clarke [log sheet]
 - Lorna Marson [Parish cltr]

**ZONE B
SHOULTON**



- ZONE B – GROUP**
- Joy Fulcher – [Lead, ca]
 - Chris Reeve [History, surv
 - Mary Pritchard [Camera k
 - Julie Foster [Log she

ZONE C - CENTRAL & CONSERVATION AREA



- ZONE C – GROUP**
- Hazel Kemshall – [Lead, Parish cltr]
 - Stuart Cumella [Martley Parish Council]
 - Bob Bayliss [History]
 - Paul Clarke [camera]
 - Gill Marson [Log sheet]

**ZONE D
NORTH WEST HALLOW**




- ZONE D – GROUP**
- Alison Young – [Lead, c
 - Jeannette Roe [History, su
 - Mike Finn [Camer
 - Jed Marson [Log sh
 - James Rose [Parish Cltr, ass sheet

**ZONE E
NORTH EAST HALLOW**



- ZONE E – GROUP**
- Peter Sweetland – [Lead]
 - Anne Stark [History and camera]
 - Traci Young [Log Sheet]
 - David Thorpe [assist camera log]
 - Chris Neville [assist with log sheets]

<p>STREET MAPS SHOWING INDIVIDUAL BUILDINGS AND HOUSES</p> 	<h3>What do now</h3> <ul style="list-style-type: none">• Five groups each allocated a zone: names of leads and persons boards• There is a group lead, a photographer, a history person, and a p to do the log sheet, and others to help• Complete the survey form- we must follow the guidelines• Stop every 50-100 yards or so, and consider what you see.• Check and answer as many questions as you can from this spot then....
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<h3>More...</h3> <ul style="list-style-type: none">• Take photos and carefully log them on the log sheet, it has boxes and a clear layout for you to record on, numbering the photos as you go.• One person should look after this log sheet and help the photographer. Always note the property and where you were standing.• Make a note of any significant views that we can follow up later.• Make a clear note of buildings, historical assets, key features, walls, hedges, "street furniture". 
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Work Together!

- Use all the experience and knowledge in your group-small things matter
- Listen to your group lead and help them- they have a lot to do
- The History people are important- they have the background knowledge
- You do not have to be an expert to contribute-you have your lived experience of the village
- Share what you know and enjoy yourselves (and do as much as you can, but don't worry!)



Be safe!

- Remember the traffic, and take a high viz vest
- Be aware of HAZARDS and keep each other safe
- Be careful out there you are volunteers and do not have any insurance cover other than your own
- Take about 2 hours or so, be diligent and stay focused
- The groups and maps are over there, and there are 3 clipboards per group: **GROUP LEAD SURVEY; HISTORY; AND LOG SHEET FOR PHOTOS**- your duties have been assigned to you
- Come back for refreshments and to hand in your clipboards and photos at the **COMMITTEE ROOM**



Appendix 2. Regulation 14 Consultees

David Thorpe Hallow Parochial Church Council

David Thorpe

[REDACTED]

Brian Boswell, Hallow Parochial Church Council

[REDACTED]

Hallow Church Rev Kalantha Brewis

[REDACTED]

Worcester Diocese

Stuart Ness

[REDACTED]

Hallow Womens Institute

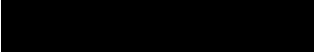
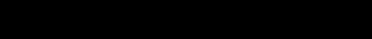
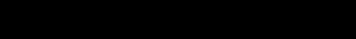

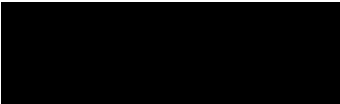
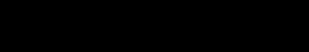

Jeanette Riddex

[REDACTED]





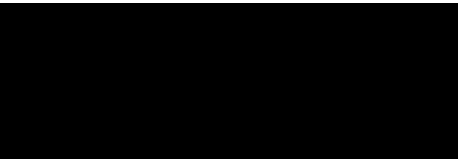
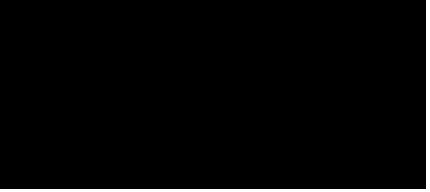
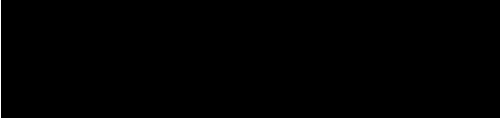

Hallow C of E Primary School via

Clerk to Governors John Jordan

[REDACTED]

Chair of Governors Alison Young 
Head Teacher Roberta Hill 
HVCG Joy Fulcher JOY FULCHER 
HALLOW PARISH COUNCIL Clerk/Chair 
Parish Hall Mrs Anne Bowlcott (Secretary) 
Crown Inn 
Ladygo Shop, Main Road, Hallow By hand
Post Office By hand
Hallow History Group Ann Finn 

Sports and Social Club [REDACTED]
Tennis Club [REDACTED]
Cricket Club 'HallowCC Secretary" [REDACTED]
Hallow Scout Group Sandra Luff, Jane Wilson [REDACTED]
Mike Ganner Hallow Allotments [REDACTED]
Grimley Parish Council Lisa Stevens [REDACTED]
Holt Parish Council [REDACTED]
Ombersley Parish Council Sue Collier [REDACTED]
District Cllr

Dean Clarke 
Phil Grove, Worcester County Cllr 
Head of Planning, WCC (or Chief Executive, WCC) 
Harriet Baldwin MP 
Bloor Homes Ltd HQ 
Eleven Property, Hallow. 
R. Care Affordable Housing Solutions 
Doorbars Estate Agent 

Fisher German 
Place Partnership 
Hallow Business Park By post
Mr L. and Mrs D. Goldsmith 
Platform Housing Group 
Claremont Planning Consultancy 
Steve Watkins Braemar 
Hayfield homes

[REDACTED]
RCare generation [REDACTED]
Piper Homes Ltd [REDACTED]
Elgar Business Park Leaflets delivered by hand.
Greenhill Farm By post
Plus two landowners contacted via MHDC. [REDACTED]

Kirkwells

The Planning People

For more information on the contents of this document contact:

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Managing Director
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Lancashire Digital Technology Centre
Bancroft Road
Burnley
Lancashire
BB10 2TP

