



RCA Regeneration Ltd.
Unit 6 De Salis Court | Hampton Lovett Industrial Estate
Droitwich Spa | Worcestershire | WR9 0QE

t: 01905 887 686
e: info@rcaregeneration.co.uk
rcaregeneration.co.uk

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

09 October 2023
Client Reference: RCA103

SENT VIA EMAIL

By email only
neighbourhoodplanning@malvern hills.gov.uk

Dear Sir/Madam,

RE: Hallow Neighbourhood Plan Review Regulation 16 Consultation (22 September – 3 November 2023)

We write on behalf of our client, Nikki Harrison, of Hallow Stage II Limited. We have previously made representations on her behalf to the Regulation 14 Consultation which ran from 22 May – 03 July 2023.

Our previous comments noted that the review only proposed amendments in respect of the settlement boundary and First Homes, which we do not consider go far enough, and we therefore consider that the Neighbourhood Plan should be subject to examination and referendum. Our representations also included objections to Policies HAL1 -Development of Land at Greenhill Lane and HAL2 – Housing Need. We note that there are now two additional Policies, which have resulted in the renumbering to those we previously commented on, to HAL2 and HAL4 respectively. We comment on each Policy as follows:

Policy HAL1 – Housing requirement

We welcome the addition of a policy clarifying the housing requirement that the Neighbourhood Plan is seeking to meet, but question the validity of this number given that the South Worcestershire Development Plan Review, where this number has been taken from, is yet to undergo examination or be found sound. Malvern Hills District Council, and indeed all three South Worcestershire Councils, are currently suffering from chronic undersupply of housing, with none able to demonstrate a five year housing land supply. We therefore find it surprising that a Category 1 Settlement would not proactively plan for growth, as it seems unlikely that no new homes will be required in Hallow before 2041.

Policy HAL2 - Development of Land at Greenhill Lane

Whilst we welcome the additional supporting text confirming that the settlement boundary has been amended to include this site, we remain concerned that a single allocation which has already been built out is the only proposed allocation in this Neighbourhood Plan, and that the extensions to the settlement boundary could not accommodate any additional homes that do not already have planning permission. We consider it unlikely that this will be sufficient to accommodate all future growth in Hallow to 2041, particularly against the backdrop of the insufficient housing land supply in Malvern Hills District and across all three South Worcestershire Council. This shortfall is likely to persist for another 12-18 months, as the SWDPR was only submitted for examination on 29 September 2023. We remain concerned that Hallow is not proactively planning to accommodate future housing need and is leaving itself open to future speculative applications over the next 18 years.



We propose allocation of our client's site at Shoulton Lane, to help provide a deliverable and affordable supply of new homes in Hallow.

Policy HAL3 – Windfall Housing Development

We welcome inclusion of this additional policy which clearly refers to the Hallow Development Boundary and its amendments, and sets out circumstances where housing may be approved outside the boundary. However, as above we consider that the settlement boundary expansion should contain additional sites to accommodate future growth. We further consider that it should also refer to entry-level exception sites in accordance with NPPF paragraph 72. We also note that it does not refer to subdivision of existing residential buildings in accordance with NPPF paragraph 80(d).

Policy HAL4 – Housing Need

We support this policy and the reference to First Homes, however without an available supply of deliverable housing as set out in our objection to Policy HAL1 and HAL2, no new homes are being delivered to meet housing need. Policy HAL4 cannot deliver its aspirations without Policies HAL1 and HAL2 being amended to allocate additional sites. As set out below, we propose the allocation of our client's site located at Shoulton Lane to help provide a deliverable and affordable supply of new homes in Hallow.

Our client's site at Shoulton Lane, Hallow

As set out above, we consider that the Revised Neighbourhood Plan should make additional allocations and we would like to highlight our client's site (please see site plan at the end of this letter). We feel that the site should be included in the Revised Neighbourhood Plan as it would make a valuable contribution towards meeting South Worcestershire's district housing target. Our client's site could deliver around 25-30 new homes based on net 30-35dph, and it is deliverable within the early stages of the plan period, without the need for significant investment in infrastructure.

The site presents an opportunity to deliver a small scheme of market and affordable housing within Hallow. The site has been previously submitted to the call for sites process under the site ref: CFS0432. The site is located between existing residential development to the west and the settlement boundary of Hallow to the East. The proposed allocation would not vastly expand the existing settlement boundary and its linear existing relationship would still remain intact. There is a variety of existing development in close proximity to the site, including residential development to the north, east, southeast and west and public houses and commercial premises to the east and southeast.

There is a public footpath that runs along the eastern boundary of the site. Vehicular and pedestrian access would come from Shoulton Lane to the south of the site. The site would provide a continuous footpath from the main road to the sites point of access, providing connectivity to the village. The site is located within walking distance to the services and facilities of Hallow which is a category 1 village.

A modest housing development on this site would gently extend the built form of the village and be viewed as infill, given the position of existing dwellings along Shoulton Lane, and we urge you to give consideration to its allocation for housing.

Yours faithfully,

Katie Parsons Msc (Hons) LLB



Shoulton Lane, Hallow

