

Hallow Neighbourhood Plan Review Regulation 16 Consultation – Malvern Hills District Council Officer Comments

These Officer comments are made on behalf of Malvern Hills District Council (MHDC), as the Local Planning Authority, on the Regulation 16 Hallow Neighbourhood Plan Review for consideration by the Independent Examiner.

Extension of the Plan Period to 2041

Malvern Hills District Council are supportive of the extension of the plan period to 2041 to align with the emerging South Worcestershire Development Plan Review.

HAL1: Housing Requirement

It is considered that this new policy has regard to national policy, making clear the housing requirement figure for the neighbourhood area as a basis for housing policies and any allocations.

HAL3: Windfall Housing Development

This new policy which clarifies the approach to windfall development and is considered to be consistent with SWDP2C.

Proposed Amendments to Development Boundary (Map 6)

Malvern Hills District Council are supportive of the inclusion of allocation HAL 2/1 in the amended development boundary and the inclusion of urban form to the north on Coppice Close. However, the proposed delineation of the new development boundary to include the green space within this allocation, as well extending the boundary to include garden land, for example on church lane to the south of the village and on Moseley Road to the north is contrary to the purpose to guide development to the most sustainable locations. These proposed changes to the development boundary to the south is not in general conformity with the adopted South Worcestershire Development Plan, and indeed the intended approach of the SWDP Review. One unintended consequence of not tightly drawing the boundary round the built form is that it could provide in-principle support for development on these parcels with limited sustainability credentials. It is noted that the Development boundary in this location intends to define the edge of built development but the drawing of the development boundary does not serve that purpose and could have unintended consequences. It is therefore requested that the boundary is amended accordingly.

Moreover, the inclusion of allocated site HAL 2/1 is supported though it is recommended that the boundary is more tightly drawn around the built form to guide development to the most sustainable locations in line with the objectives of the SWDP.

Policy HAL4: Housing Need

There are different elements of this policy and for ease of navigation of the policy, and also for decision making purposes, it is recommended that the different parts are numbered. The recommended format would be that in the current SWDP, for example SWDP14.

The reference to the provision of first homes is supported, with the support for the provision of all forms of affordable housing for sale, including first homes through the inclusion of relevant policies and identification of suitable sites in neighbourhood plans being encouraged by national planning policy¹. First homes are discounted market sale units which must be discounted by a minimum of 30% against market value.

The First Homes Written Ministerial Statement of 24 May 2021² sets out that this minimum discount level can be specified and neighbourhood planning groups will be able to apply a higher minimum discount of either 40% or 50% to First Homes, where the evidence justifies this. A higher discount can therefore be set as a percentage but specifying a sale price of '£125,000' may not be in conformity with national guidance and would not be recommended due to inflationary price change. Furthermore, the council is concerned that setting such a low price may harm the delivery of First Homes because it is well below the cost of homes within the council area. It is also considered that setting the cap at the income levels for minimum pay for classroom teachers may not be specific enough and queries why this particular key worker income is referenced.

¹ Paragraph: 017 Reference ID: 70-017-20210524

² [Written statements - Written questions, answers and statements - UK Parliament](#)