

Examiner’s questions	Colwall Parish Council Response
<p>1. Would you provide me with an update of Table 2 on completed developments and commitments.</p> <p>Is the assumption that 24 dwellings will be deliverable through windfall plots in the remaining plan period reasonable?</p>	<p>Refer to HC response.</p>
<p>2. Would the QB and HC advise me on the delivery of housing in the parish over the last 3 years in view of the comment in the representation by Collins that is promoting a buffer of 20%. NPPF para 73 calls for a buffer of 20% where there has been significant under delivery of housing over the previous 3 years.</p>	<p>Herefordshire Council has advised that the proportional growth target for Colwall Parish is 160. To date built development and commitments comprise 130 dwellings with 11 years of the plan period remaining.</p> <p>In Herefordshire housing delivery is calculated on a countywide basis and not on a parish level. The Housing Delivery Test shows that from 2016-2019 Herefordshire had provided 80% of the housing required. This is an increase of 6% from last year.</p> <p>Herefordshire Council's report on the Five Year Housing Land Supply (2020 - 2025) Annual Position Statement at 1 April 2020, September 2020, sets out in para 6.6 that 'Herefordshire has seen the highest number of completions since the start of the plan period in 2011, this is a clear indication of that the construction industry is very active within the county. This year’s completions have helped to reduce the shortfall and will be reflected in the results of the national Housing Delivery Tests due for November and potentially impacting positively upon future five-year housing supply targets.'</p> <p>NPPF para 73 sets out that 'The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of: a) 5% to ensure choice and competition in the market for land; or b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply³⁹.' Footnote ³⁹ defines under delivery:</p>

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	<p>'From November 2018, this will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement.'</p> <p>The NDP housing target of 176 dwellings provides for a 10% buffer (see paragraph 6.1.1 subpoint 2, p26). This was discussed with Herefordshire Council at an early stage in the Plan's preparation and was retained in the submission version of the NDP.</p> <p>A 20% buffer would require at least 192 dwellings over the plan period, or a net figure of 62 up to 2031 taking into account the most up to date figure for completions and commitments (130). The 2 proposed site allocations in the NDP would provide around 41 new houses (9 on Site 1 + 32 on Site 2 = 41), leaving 21 houses to be found through windfall development up to 2031. This is likely to be achievable, taking into account the NDPs' windfall allowance of 2 dwellings pa, (see Colwall Parish Council Table of New Residential Planning Applications since 2011, attached) based on historical figures. The Table shows that even when the 3 larger developments during the 3 year period from 2018, 2019 and 2020 are discounted, small scale windfalls still provided 6 dwellings (at least 2 dpa) in the Parish.</p> <p>Therefore with 11 years of the plan period remaining, windfalls are likely to provide 22 dwellings, just exceeding the 21 dwellings required, even if a 20% buffer is applied.</p> <p>It is worth noting that a number of other NDPs in Herefordshire (such as Stretton Grandison NDP which has recently been through examination) have not included a 20% buffer.</p> <p>Overall therefore the Parish Council would prefer the supporting text to refer only to the minimum target figure of 160 dwellings over the Plan period (even though a 20% buffer is considered achievable).</p>
<p>3. Would you provide me with the report of the full site assessment forms covering factors other than those addressed in the LCSA.</p>	<p>The site assessments are available on the NDP website.</p> <p>Please click on this link or copy and paste into your browser:</p> <p>http://www.colwallneighbourhoodplan.org.uk/Reg15Submission/All%20site%20assessments%20Oct%202019.pdf</p>

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<p>4. Policy CSB1 and Policy CD2: - The third part of Policy CSB1 includes a design principle. It is not clear how this principle is to be applied.</p> <p>I am proposing to delete it and to revise Policy CD2 point 3 to read: “.....Schemes should aim to be integrated into the existing streetscape.....will not be supported. Where possible, built form should respect and continue the existing building line.” Would the QB confirm that this is acceptable.</p>	<p>The Parish Council accepts the proposed changes to the text.</p>
<p>5. Policy CD2 point 12 refers to Exceptional Key Views; other policies refer to important views.</p> <p>Map 7 shows the classification of 2 locations from the Malvern Hills AONB viewpoints as Exceptional or Special.</p> <p>The Visual Study did not attempt to grade the quality of the viewpoints and referred to them all as important views. Would the QB explain the change to the term “exceptional” in the description of viewpoints and consider whether this seeks to give greater status to the viewpoints than was intended by the assessment in the Visual Report and whether this greater status can be justified.</p>	<p>Unfortunately a previous version of the Visual Study was provided on the NDP website in error.</p> <p>The final version of the Colwall NDP Visual Study Report has now been provided on the website and this refers to 'Exceptional Key Views' as agreed with officers from the Malvern Hills AONB. The report includes an additional paragraph, 2.7, explaining the changes. The revised report is available here;</p> <p>http://www.colwallneighbourhoodplan.org.uk/Docs2/Colwall%20NDP%20Visual%20Study%20Report%20Jan%202019%20issued%208Oct20_Optimized.pdf</p> <p>Figure VS3 Viewpoint Location Plan of the Visual Study is included in the NDP as Map 7. As a consequence of the changes to the Visual Study a revised NDP Map 7 is required and this has also been added to our website and should replace the existing Map 7 in the Submission NDP. The revised Map 7 is available here;</p> <p>http://www.colwallneighbourhoodplan.org.uk/Reg15Submission/Colwall%20NDP%20Rev%20Map%207%208Oct20.pdf</p> <p>Please note there is also a typo here. Policy CD2 12 should read:</p>

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	<p>12. Development will be required to demonstrate how the design has considered the visual impact of the pattern of buildings on the identified Exceptional Key Views as set in Policy CD2 Policy CD1 and Map 7.</p>
<p>6. Policy CD3 – Former Primary School – Point 1 says agreement will be required from the Malvern Hills Conservators for access across the common land. Have discussions been held with the Conservators to ascertain whether they are likely to agree to this?</p>	<p>Yes, the access has been discussed with the Malvern Hills Trust (previously called the Malvern Hills Conservators). There are in fact already 2 accesses across the common land to this site, for which the Malvern Hills Conservators have granted easements; one serving the school and one to a field. The school access consists of a one-way loop creating a significant area of hard surfacing. The expectation is the new access would provide a saving in paved area and reduce the accesses across the common land to one.</p> <p>The Parish Council has spoken with the Senior Officer who confirmed that a realignment of the existing access to the closed school and field access (either of which is expected to provide adequate access to the development) can be given consent to at Officer level.</p> <p>In the event that a new easement or additional hard surfacing (in total) is required, this would require approval of the Board of the Malvern Hills Trust.</p>
<p>7. Policy CD4 Grovesend Road – Point 2 seeks provision of a safe pedestrian and cycle route, however, HC Transportation have questioned whether this is achievable. The PC state in their response that this is a Highways requirement. Would HC comment on whether this highways requirement is deliverable?</p>	<p>Refer to HC response.</p>
<p>8. Policy CD4 Grovesend Road The landowner’s agent is seeking a cross reference to the Malvern Hills AONB Guidance on Highway Design to give a degree of flexibility to enable various options to be explored.</p>	<p>The QB is concerned that Herefordshire Council’s Highway Design Guide for New Development has not been updated since July 2006 and housing layout design has changed significantly since then. It is also aligned to urban areas, essentially Hereford. Herefordshire’s Transportation policies endorse the publication 'Traffic in Villages' which is better aligned to our AONB setting and also recognises the principles of Manual for Streets and MfS2 with their context-based</p>

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Would HC confirm the appropriate highways design guidance that should be referred to in the Plan.	approaches. As noted by HC in their response to Question 9, the local highway authority supports the AONB Guidance on Highway Design as informal guidance.
9. What is the status of the Malvern Hills AONB Highways Design Guide? Should it be cross referenced from the justification in the policies in the plan itself rather than in in Appendix I?	Refer to HC response.
<p>10. Policy CD4 Grovesend Road - Would the QB explain why the land to the west and south of the housing allocation has been included in the Plan as public open space. It is noted that part of it is shown on the indicative layout plan as subject to landowner agreement.</p> <p>Also it is shown incorrectly on the Policies Map as a Local Green Space instead of a proposed green space.</p> <p>Would the QB comment on the suggestion by the landowner that these areas of open space should be omitted and open space should be included in the site allocation itself.</p>	<p>Please refer to the previously submitted document, Parish Council Response to Regulation 16 Comments Objecting to Site Allocation Policy CD4 Site 2 Grovesend Farm (Approximately 32 houses) 28 July 2020.</p> <p>The area identified as open space has been protected as open space in the NDP in response to recommendations in the LSCA:</p> <p>'Area 12B (Parts 1 and 2) are assessed as having an overall capacity for development of Low to Medium / Low and the report sets out 'Development would have adverse effects on landscape character / visual amenity / GI - area not recommended for consideration. Levels of quality / value / GI function could be increased by creating new community green space in field with access from E and W and restoring / protecting heritage assets.'</p> <p>The approach in the NDP is to identify the area most suitable for new housing development as the housing site allocation (shown in yellow), and to exclude the area identified as Area 12B in the LSCA. This area should be protected as green / open space.</p> <p>The error is on the Herefordshire Council Policies Map. The area is shown on the Policies Map in the NDP (p32) as "Allocated development sites - Green Space".</p> <p>The Parish Council would prefer to retain these two areas as open space as shown on the NDP Policies Map. If the green areas were to be included within the site allocation boundary then there would be a greater risk of built development in areas that should be protected.</p>

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	However, if the Examiner recommends the site allocation boundary is extended to include the green / open space, then the Parish Council requests that the colouring to indicate green space should be retained.
11. What is the status of the AONB Guidance on Building Design and the associated colour palette? Has it been adopted as SPD by HC or is it informal guidance only?	Refer to HC response.
12. Policy CD6: Would the QB comment on the proposed text to be added to the beginning of the policy to help make the purpose of the policy explicit: “The conversion of farm buildings for residential use or the extension of existing farm dwellings should take account of the following design principles:” It is also proposed to retitle the policy “The Conversion of Farmsteads to Residential Use and the Extension of Existing Dwellings on a Farmstead”.	The Parish Council accepts the proposed changes to the text.
13. Policy CD6: I am proposing to recommend that point 7 is deleted as it is no longer relevant with the change in focus of the policy. The final clause of point 8 and the final sentence of point 11 are explanations and not policy so I am proposing that they should be moved to the justification and point 12 is revised to read: “Where there is no hard boundary definition between farm buildings and the landscape, new buildings and extensions should follow this characteristic.” Would the QB confirm their acceptance.	The Parish Council accepts the proposed changes to Point 7 (deleted), Point 11 and Point 12.

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<p>14. Policy CD8 – point 14. Malvern Hills AONB has suggested revisions to the text which the QB has proposed should be accepted.</p> <p>The text on page 20 of their response to the representations is unclear as to what the revised text should be. Would they clarify this please.</p>	<p>The Parish Council has consulted again with the officer at MH AONB and the suggested revision to the Policy CD8 point 14 should read:</p> <p><u>'Using darker colours on roofs than on walls makes a building appear smaller. Dark roofs, however, may increase heat absorption and would require additional ventilation if used for housing livestock. In all cases the colours and tones of materials should be chosen with reference to the local context and views.'</u></p> <p>In addition the AONB recommends adding a reference to the following AONB guidance on p13/14.</p> <p>Guidance on how development can respect landscape in views, 2019</p> <p>Guidance on keeping horses in the landscape, 2010</p> <p>See https://www.malvernhillsaonb.org.uk/managing-the-aonb/guidance-documents/</p>
<p>15. Policy CD8 – Would the QB and HC review whether points 4, 5, 6 and 7 are necessary if point 26 of Policy CD2 is set out as a separate policy applying to the whole of the plan area.</p> <p>Would you consider whether there should be a cross reference to the new policy (point 26) included in the justification to Policy CD8 and whether it would be more appropriate to include points 4 – 7 in the justification as examples of how to achieve the integration of large buildings into the landscape.</p>	<p>The Parish Council accepts the proposed change to CD8/CD2 but is concerned that some of the detail in CD8 may be lost in the new Policy if the existing wording from CD2 Point 2 only is retained.</p> <p>Therefore the following revised wording is suggested to existing CD2 Point 2, to ensure all elements in CD8 are covered in the new Policy:</p> <p><u>'Large buildings and structures, such as industrial, commercial and farm buildings should be successfully integrated into the landscape. Techniques to achieve this should include the following:</u></p> <ul style="list-style-type: none"> • Sensitive siting <u>whereby buildings on sloping sites are constructed on lower slopes or on a break in the slope;</u> • Breaking up rooflines into smaller elements <u>by stepping the roofline;</u> • <u>Using several smaller buildings rather than a single large one, particularly on sloping topography and where there is limited space for development;</u>

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	<ul style="list-style-type: none"> • <u>Setting back or projecting some sections of the building and using overhanging eaves; and</u> • Providing detail and visual interest on larger elevations through imaginative use of local materials and the appropriate use of locally characteristic landscaping. <p>Finishes to elevation and roofs should normally be non-reflective, recessive and complementary to the local landscape setting.'</p> <p>The Parish Council's agrees that a cross reference to the new Policy should be included in the justification to Policy CD8. However, if possible, the amended version of the new proposed Policy as set out above, should be used to give more weight to the various suggested techniques.</p> <p>If the Examiner does not agree with the proposed change to wording in the new Policy, then the Parish Council agrees that various techniques as set out in CD8 Points 4-7 should be included in the supporting text of the new Policy as examples.</p> <p><u>HC:</u></p> <p>The detail in Policy CB8 (4, 5, 6 and 7) is very prescriptive and could be equally covered in the more general wording of Policy CB2 (26) with the detail within the justification. Therefore, HC would be content to support the cross reference to Policy CB2.</p>
<p>16. Policy CF1 – I am proposing to include the revision to the policy proposed by the QB. To help to make the policy directly relevant to the parish, it is suggested that a list of the names of local community and social facilities that are to be safeguarded under this policy should be included rather than relying on generic examples (such as the public houses and village shop). Would the QB provide me with a list of the</p>	<p>The Parish Council suggests the following:</p> <ul style="list-style-type: none"> • Colwall Village Hall, including St Crispin’s Chapel • The Scout Hut • Colwall Cricket club and its ground • Colwall library and • Public houses: The Crown, The Yew Tree and The Chase.

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community facilities they propose to include for safeguarding under this policy.	
17. Policy CF3 – The policy does not include a policy statement towards managing any future development in the LGS. Would the QB confirm the following is acceptable in accordance with NPPF paragraph 101 “Development on this area will not be supported except in very special circumstances.”	The Parish Council accepts the proposed additional wording.
18. Policy CRE1 – What evidence is there to justify the statement that wind turbines are not considered appropriate in the plan area? Was any consideration given in background evidence to whether small wind turbines could be located in the area and if so, which locations might be suitable?	<p>NPPF Footnote 49 sets out: "Except for applications for the repowering of existing wind turbines, a proposed wind energy development involving one or more turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan; and, following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing.'</p> <p>The Parish Council considers that Colwall NDP's location within the AONB means that any proposals for wind turbines are likely to have an unacceptable impact on the sensitive landscape.</p> <p>If the Examiner proposes to amend the wording to provide greater flexibility then it is suggested that regard be had to the Malvern Hills AONB GUIDANCE – Small-scale Wind Turbines</p> <p>http://www.malvernhillsaonb.org.uk/wp-content/uploads/2015/02/Wind-Turbines-Final.pdf</p>

ATTACHMENTS AND LINKS TO SUPPORTING DOCUMENTS

Examiner's Question	Supporting Document / Link
Q2	Colwall Parish Council Table of New Residential Planning Applications since 2011 (attached) Five Year Housing Land Supply (2020 - 2025) Annual Position Statement at 1 April 2020 September 2020, Herefordshire Council https://www.herefordshire.gov.uk/downloads/file/21142/amr-2020-appendix-b-five-year-land-supply-document
Q3	Colwall NDP Site Assessments http://www.colwallneighbourhoodplan.org.uk/Reg15Submission/All%20site%20assessments%20Oct%202019.pdf
Q5	Colwall Neighbourhood Development Plan Visual Study Report (Final Version) and including new NDP Map 7. http://www.colwallneighbourhoodplan.org.uk/Docs2/Colwall%20NDP%20Visual%20Study%20Report%20Jan%202019%20issued%208Oct20_Optimized.pdf Map 7 http://www.colwallneighbourhoodplan.org.uk/Reg15Submission/Colwall%20NDP%20Rev%20Map%207%208Oct20.pdf
Q10	Parish Council Response to Regulation 16 Comments Objecting to Site Allocation Policy CD4 Site 2 Grovesend Farm (Approximately 32 houses) 28 July 2020 (attached)
Q14	Malvern Hills AONB Guidance Documents Guidance on how development can respect landscape in views, 2019 and Guidance on keeping horses in the landscape, 2010 https://www.malvernhillsaonb.org.uk/managing-the-aonb/guidance-documents/
Q18	Malvern Hills AONB Guidance – Small-scale Wind Turbines http://www.malvernhillsaonb.org.uk/wp-content/uploads/2015/02/Wind-Turbines-Final.pdf

Colwall Parish Council Table of New Residential Planning Applications since 2011

Application Number	Application Details	Council Comments and Application Decisions	No of additional dwellings
DMN/101505/F (2011)	Proposed construction of 20 new dwellings and new access road and related works at Covent Garden, Brockhill Road, Colwall Agent: Banner Homes Ltd.	Granted	20
DMN/112091/L and DMN/112090/F	Change of use from commercial film studio to single residential dwelling at The Studio, Park Farm, Colwall Applicant: - K Duddy Agent: - Gibson Associates.	Granted	1
DMN/113211/F (revised application 2013)	Construction of detached dwelling within cartilage of existing garden at 2 Orlin Road, Colwall Applicant: D Day Agent: Gibson Associates	Granted	1
N123067/F (Dec 2012)	Erection of two storey dwellinghouse on land at The Coach House, Old Church Road, Colwall Applicant: R Beard Agent: Kirk Rushby	Granted	1
DMN/120994/F (April 2012)	Demolition of existing dwelling and erection of 5 dwellings with associated parking at Four Gables, Walwyn Road, Colwall Applicant: SPM Homes Ltd Agent: Clive Petch	Granted	Net 4
DMN/132321/F (Sept 2013)	Erection of 12 new dwellings(6 of which are affordable) in The Field adjoining Brookmill Close Colwall Applicant: A Jamieson	Granted	12
DMN/132734/F (Oct 2013)	Demolition of existing buildings, excluding grade II Listed Tank House, a small lodge and associated substation and the erection of 25 new dwellings comprising of 12 purpose designated units for older residents, 4 open market units and 9 affordable units plus a retail unit and 46 bed nursing home.at the former Bottling Site of Malvern Water, Walwyn Road, Colwall.	Granted	25
DMN/140371/O (March 2014)	Erection of a two-bedroom dwelling with parking on land Adjacent to Oxford House, Walwyn Road, Colwall. Applicant: A Boughton. Agent:n/a.	Granted	1

P141827/F (Aug 2014)	New 3 bedroomed dwelling at Beacon View, Mill Lane, Colwall	Granted	1
P143806/F (Feb 2015)	Conversion of barn to single residential dwelling at Hoe Farm, Colwall	Granted	1
RE: 153791 (Jan 2016)	Proposed demolition of existing bungalow and replacement with 2 four bedroom detached dwellings with garages at Two Elms, 5 Crescent Road, Colwall, Herefordshire, WR13 6QW Applicant ; M Allard.	Granted	Net 1
Re: 162532 (granted 6/9/2016)	Proposed new house, garage and amenity space land adjacent to Fox Court, Walwyn Road, Colwall	granted	1
Re: 170278	Outline application with some matters reserved except for access, landscaping, layout for a residential development of 9 behind the Thai Restaurant	granted	9
171755 (granted 29/5/2018) Not included in the highlighted ones because this became (170278)	Outline for one new four bedroomed dwelling behind Brookhouse, Walwyn Road	granted	1
174574 (granted 18/5/2018) became 170278	Outline planning of up to 5 dwellings with associated vehicular access in the land off Brookmill Close, Walwyn Road, Colwall	Granted	5
181274 (granted 12/18)	Proposed erection of three storey building accommodation 26 retirement flats. The erection of a terrace of 5 dwellings with 11 car parking spaces the erection of a single storey outbuilding accommodation refuse, cycle and garden maintenance storage at the site at Walwyn Garden, Walwyn Road, Colwall, Herefordshire. (Granted of which 11 are affordable) Applicant: D Allen.	Granted	31 Of the which 5 have been built The 26 are on hold (7/20)
183202 (refused 2/19)	Land to the Rear of Paddock End and The Way. Proposed erection of 2 no 5 bedroom houses and associated garages, driveways and amenity space Applicant: S Billingham. (strongly objected to)	Refused Appeal Dismissed	0
RE: 183135 (granted 7/2/19)	Proposed demolition of existing house and redevelopment of site to provide 3 no 2 storey four bedroom Passivhaus house dwellings at Beacon View, Mill Lane, Colwall, WR13 6EQ. Applicant: Mr & Mrs Hill. (no objection)	Granted	Net 2
184039 (granted 3/19)	In the pipeline an additional 3 units to be added to the 5 granted in 174574 (see above)	Granted	3
183829 (granted 3/19)	One 5 bed roomed detached house land adjacent to Longacre, Evendine Lane, Colwall.	Granted	1

192249 (granted 10/19)	Proposed 4 bedroom house with ancillary 1 bedroom annexe and garage at Land north of Caves Folly Nursery, Evendine Lane, Colwall, Herefordshire, WR13 6DX	Granted	1
192834/F	Land to the Rear of Paddock End and The Way. Proposed erection of 1 no 5 bedroom houses and associated garages, driveways and amenity space	Refused 10/19	0
191788 (granted 7/8/2019)	Removal of mobile home and erection of bespoke handcrafted log cabin for permanent occupancy at Fishponds, Mill Lane, Colwall	Granted	1
193186/O (granted 23/2/2020)	Proposed erection of 1 no. residential dwelling at Checketts, Old Church Road, Colwall, Malvern, Herefordshire. Applicant: Ashton	Granted	1
201858 (this is instead of 181274 which was 26 retirement flats of which 11 were to be low cost units)	The erection of one apartment block comprising of 23 retirement apartments and a carer's apartment; one apartment block comprising 9 retirement apartments and associated works where the retirement apartments are age restricted to 55+ years	Pending 7/20	33 new units

Highlighted in green are those one off "windfalls" within the former UDP settlement boundary for a single dwelling or two dwellings. These figures exclude the 3 larger developments during the 3 year period 2018-2020 inclusive.

Parish Council Response to
Regulation 16 Comments Objecting to Site Allocation Policy CD4 Site 2
Grovesend Farm (Approximately 32 houses)
28 July 2020

1.0 Introduction and Background

- 1.1 This document has been prepared by Mrs Louise Kirkup, a Director of professional town planning consultants Kirkwells Ltd, with the involvement of Mr John Stock (see below) on behalf of Colwall Parish Council. Mrs Kirkup has over 25 years' experience of town planning in the public and private sectors. She has a degree in Land Management (Development) from the University of Reading, a Masters of Civic Design from the University of Liverpool and has been a full member of the Royal Town Planning Institute (MRTPI) since 1996.
- 1.2 Mr John Stock is a parish councillor and leads the Neighbourhood Development Plan Working Group in a voluntary capacity. In his professional life he is Chartered Civil Engineer with over 45 years of highway planning experience including preparation of schemes under the Highways Act 1984 and latterly via Development Consent Orders. He is a Technical Director at WSP, a world-wide engineering consultancy where much of his work has been in Areas of Outstanding Natural Beauty, working closely with landscape architects to minimise and mitigate the impact of infrastructure on the landscape. He also has significant experience of writing highway design standards and guides including specifically for AONBs, that recognises the importance of the landscape.
- 1.3 The parish council's objection to this development is based on the LSCA prepared for the Colwall Neighbourhood Development Plan by Carly Tinkler BA CMLI FRSA MIALE, who has provided specialist landscape and colour advice to Colwall Parish Council since 2013. The parish also liaised with the Malvern Hills Area of Outstanding Natural Beauty Unit with whom they have a long-term working relationship. Carly Tinkler was also heavily involved in the development of the new school which is adjacent to this development site, which afforded further information on which to assess the sensitivity of the site.
- 1.4 This document has been prepared in response to the comments submitted by a number of respondents to the Regulation 16 public consultation on the Colwall NDP, which set out objections to the proposed site allocation for 37 new houses at Grovesend Farm. Firstly, it should be noted the approximately 37 homes is not correct, it should be 32 houses. It is hoped this correction will be recommended by the examiner. This response is based on the provision of 32 homes.
- 1.5 It provides information about the background evidence and reasoning supporting the site allocation process in the NDP, and the Parish Council's decision to include the site at Grovesend Farm in the Submission Plan.
- 1.6 It addresses the key points made in the representations to Herefordshire Council during the Regulation 16 consultation process.
- 1.7 A number of respondents suggested the recent proposal for housing development at Mill Lane should be substituted for the proposed site allocation in the NDP at Grovesend Farm. This document is provided in addition to the document setting out the Parish Council's

Response to Regulation 16 comments supporting planning application for new housing at Mill Lane¹, and should be read alongside it.

1.8 The Parish Council notes the concerns raised by residents, many of whom live close to the proposed development, but considers that, on balance, new housing development on the Grovesend Farm site is supported by the technical evidence. There is a lack of other suitable and available sites in Colwall, and there is a need to meet the indicative housing requirement for the NDP area. The landowner, through their agent, has confirmed that 'the site is suitable, available and achievable for housing development, and therefore [they] consider there are no insurmountable constraints to the delivery of the site during the plan period.'

2.0 NDP Approach to Identifying Proposed Site Allocations

2.1 Planning Policy Context

2.1.1 The housing requirement for Colwall NDP is set out in the adopted Herefordshire Council Core Strategy, 2015. An indicative housing growth target of 14% is given for the Ledbury rural Housing Market Assessment (HMA) (Policy RA1) within which the NDP areas lies, and Colwall village is identified as one of the settlements which are the main focus of proportionate housing development (Figure 4.14 in the Core Strategy). The Colwall NDP includes site allocations and an estimated windfall allowance to meet the up-to-date housing requirement of 46 further dwellings over the plan period, taking account of recent development and commitments.

2.1.2 Colwall NDP area is located entirely within the Malvern Hills AONB. The NDP has therefore been prepared in accordance with NPPF 2019, paragraph 172 which sets out that 'great weight should be given to conserving and enhancing landscape and scenic beauty in in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.'

2.1.3 National Planning Practice Guidance (PPG) goes on to provide more detail:

'How should development within National Parks, the Broads and Areas of Outstanding Natural Beauty be approached?

The National Planning Policy Framework makes clear that the scale and extent of development in these areas should be limited, in view of the importance of conserving and enhancing their landscapes and scenic beauty.

Paragraph: 041 Reference ID: 8-041-20190721 Revision date: 21 07 2019.

2.2 Consideration of Landscape Sensitivity and Landscape Sensitivity and Capacity Assessment

2.2.1 Taking into account the need to take a landscape-led approach in the NDP and following advice from the Malvern Hills AONB officers, and with their assistance, a landscape architect was commissioned at an early stage by the Parish Council to review the areas immediately adjacent to the former UDP settlement boundary and to assess their relative importance in respect of landscape character and visual amenity. This resulted in the published 'Preliminary Assessment of Settlement Boundary – Landscape Appraisal', dated March 2013.

¹ Parish Council Response to Regulation 16 comments supporting Planning Application P200156/O Outline planning application for a residential development with all matters reserved except for access for up to 37 dwellings, Land off Mill Lane, Colwall

This assessment identified 8 sites which demonstrated the most obvious potential [for development] based on a preliminary 'rapid' assessment of areas adjacent to the settlement boundary. It was considered unlikely these sites alone would provide sufficient development to satisfy the housing target due to other constraints, and so a more detailed assessment was commissioned to establish whether further sites could accept development and to grade their relative impact on the AONB.

2.2.2 The purpose of the additional technical study, the Landscape Sensitivity and Capacity Assessment (LSCA), was to identify areas on the outskirts of Colwall's settlement where future residential development could potentially be sited without giving rise to unacceptable levels of adverse effects on landscape character and visual amenity. The Stage 2 Landscape Sensitivity and Capacity Assessment (LSCA) was published in September 2013 and graded parcels of land immediately outside the historic settlement boundary.

2.2.3 Over the following years the LSCA was updated several times, finally in October 2019, to take account of the visual impacts of new development schemes which were built out over the period, and to consider further information and assessment work prepared for developers, including the new primary school.

2.3 Identification of Grovesend Farm as a Proposed Site Allocation

2.3.1 During the very early stages of the NDP's preparation, Grovesend Farm was not considered as one of the options for housing development, as a number of other identified areas were considered to be less sensitive and to have a greater capacity for development. Grovesend Farm was not therefore consulted upon for housing development during the Autumn 2015 public consultation on the emerging First Draft Plan. It was, however, considered as an option for the new primary school.

2.3.2 As work progressed on the NDP, a number of other potential sites had to be discounted from the process. In summary:

- Planning and technical constraints were considered in more detail and as a consequence several sites were discounted on highway access and other grounds. (see All Site Assessments, Oct 2019, available on the Colwall Neighbourhood Plan website www.colwallneighbourhoodplan.org.uk);
- Landowners of potential sites were contacted about whether they were willing to develop their sites and almost all landowners indicated their sites were unlikely to come forward over the plan period (see copies of letters from landowners in Appendix II of the Consultation Statement);
- Herefordshire Council made the decision to develop the site off Mill Lane next to the village hall for the new primary school and initially to provide a mixed development with housing. Subsequently, it chose to only develop the school leading to the loss of a potentially suitable housing site;
- The LSCA had to be updated to account of new development which affected the sensitivity ratings of other potential sites; and
- There were several changes to the net housing requirement over time, from the addition of 10% to the target to give resilience to it being achieved and the reduction in housing following the redevelopment of 34 bedsits for 18 new dwellings.

- These increases in requirement were offset by planning approval for a mix of houses and apartments on the former bottling plant site instead of the nursing home, which did not qualify towards the target.

2.3.3 Overall therefore, the Parish Council had to consider other possible sites to meet the indicative housing requirement set out in the Core Strategy in the NDP.

2.3.4 As an example, Figure 1 below provides a summary position statement on the various housing sites as at October 2017.

Figure 1 Housing Site Position, October 2017

October 2017					
Area Ref	Description	Landscape Capacity	Capacity Rating 9=high capacity, 1=none	Possible Dwellings towards target (Deliverable)	14% target on 1141 properties in 2011 = Less achieved to date Less windfall in remainder of Plan based on past 5 years excl large devs Minimum number needed to satisfy target
Comments					
	Bottling Plant (Nursing home)	Brownfield & in SB		Not Count	Not permitted towards target because of extant planning permission, nursing beds not count though high over provision in Colwall
	Existing school site	Brownfield & in SB		14	In conjunction with 3a below. Revised LSCA supports this development and suggests 14 properties. HC suggested 6 to match adjacent and take account of village style. As >5 need adoptable standard access which may need flexibility from highways to allow more visually acceptable designs in Village Green. If it is also a requirement for the access to be adopted, it would be an additional barrier. Note, CIL kicks in at 10 or more houses.
3a	Adj old school	Medium to High	7	incl above	To be developed jointly with Area Ref 3a. Above
9a	Village Hall to Thai	Medium to High	21	Not Deliverable	Used for new school site
16a1	Redland Drive	Medium to High	7	Not Deliverable	Landowner stated no development will be permitted
16a2	Redland Drive	Medium to High	7	Not Deliverable	No highway access or reasonable prospect of access.
1a	Picton Gardens	Medium to High/Medium	6	Not Deliverable	Landowner timescale for development beyond the Plan date.
21a	Behind Thai	Medium to High	6	7	Additional properties to current permission, but may not be achievable.
19	Cowl Barn Lane	Medium to High/Medium	6	Not Deliverable	Rejected in SHLAA 2012. Reduced development area to landowner interest and avoiding orchard means now too few to support construction of access to adoptable standards which is seen as essential.
7a	3rd side village green	Medium	5	Not Deliverable	Landowners timescale too late. If only one access permitted removes 'connection' between properties and Walwyn Road and the Green which was sought. Width of verge is also whilst attractive is counter to the wish to change the nature of the road here.
7b	3rd side village green	Medium	5	Not Deliverable	as above
17a	N of Cowl Barn Lane	Medium	5	Not Deliverable	No highway access
20	Downs school	Medium	5	Not Available	Currently built-up as contains Downs School
5a	Tan House Farm	Medium/Low to Medium	4	Not Available	Currently built on.
Part of 5	Behind Tan Hill Farm	Medium/Low to Medium	4	Not Deliverable	Access off Yew Tree Close. Complex to achieve because of need to re-site and rebuild garages. Would be subject to a 'local' LSCA indicating Capacity Rating of 4 or higher to be acceptable in the AONB. Not previously suggested and therefore likely to be seen as offered because other sites removed for various reasons all of which would equally apply here.
12	Grovesend	Medium/Low to Medium	4	37	Agreed by Herefordshire highways subject to pedestrian access arrangements
5	Netherpaths track	Low to Medium	3	Not Deliverable	Unacceptable in the AONB at Capacity Rating 3. Local LSCA unlikely to alter. Access difficulties, remote from village though adjacent to settlement. Not previously suggested and therefore likely to be seen as offered because other sites removed for various reasons all of which would equally apply here.
17	N of Cowl Barn Lane	Low to Medium	3	Not Deliverable	No access
3	Behind schools	Low to Medium/Low	2	Not Deliverable	Inappropriate in the AONB to develop areas with a Capacity Rating of only 2.
15	West of Mathon Road	Low to Medium/Low	2	Not Deliverable	Inappropriate in the AONB to develop areas with a Capacity Rating of only 2.
16	North of Redland Drive	Low to Medium/Low	2	Not Deliverable	Inappropriate in the AONB to develop areas with a Capacity Rating of only 2.
1 & 2 Barton Villas		Low	1	Not Deliverable	Historically rejected in SHLAA. Unacceptable in the AONB with a LSCA Capacity Rating of 1 unless a local LSCA gives a Capacity Rating of 4 or greater. Put forward by landowner Count is 9 properties less 2 demolished. Access for 9 dwellings is unlikely to be acceptable because of location on the inside of the bend.
9	Mill Lane adj school	Low to Medium	1	Not Deliverable	Unacceptable in the AONB with a LSCA Capacity Rating of 1
Plots 1, 2, 4, 6, 7, 8, 9, 10, 11, 13, 14, 18		Low	1	Not Deliverable	Not considered appropriate for development in the AONB as have the lowest Capacity Rating
Totals				58	Totals
Exceeds target by				8	

- 2.3.5 Throughout the NDP process, residents were kept informed through a number of well-publicised open meetings, and the Parish Council and Working Group sought to engage with stakeholders at all times. More detailed information is provided about this in the Consultation Statement. These engagements stressed the Council's approach to the choice of development sites being made on landscape grounds, unless sites were not deliverable.
- 2.3.6 The Draft NDP was published for Regulation 14 Public Consultation Formal Consultation from 1st February 2018 to 18th March 2018. The proposed site allocation for 37 new houses at Grovesend Farm was included as Site 2 under Draft Policy CD3. There were a significant number of objections to the site from local residents, largely on the grounds of over-reliance on the LSCA in the NDP process, impacts on highways from additional traffic, poor accessibility, loss of green space and adverse impact on the Conservation Area.
- 2.3.7 However there were also a significant number of respondents who supported the proposal and the NDP as a whole. The supportive representations were balanced against the objections, and the need to meet the indicative housing requirement in the NDP. The Site Allocation Policy and other NDP Policies were reviewed and amended to address concerns about design, landscape, protection of built heritage and to encourage walking and cycling and reduce reliance on the car.
- 2.3.8 Prior to Submission, the LSCA was updated and the final version (October 2019) identified Grovesend Farm as Areas 12A and 12B. The assessments (p31 - p32) are reproduced below:

AREA 12A

Location: West side of settlement at Colwall Stone, south of Old Church Road.

General Description: L-shaped part of larger open sloping field currently used for grazing sheep. E boundary tight up against existing settlement, N boundary = Old Church Road. Improved grassland, mature & ornamental trees on boundaries. Good hedge along track to W.



Key Baseline Features: Conservation Area. Listed buildings (Grade II) in vicinity. Victorian industrial heritage buildings / features adjacent SW and S boundaries (ice works / tramway), ag. / forestry buildings & coniferous plantation to SW. Strong influence of Hills to E but local setting mostly confined to boundaries. Public fp.

Landscape Sensitivity: High to Moderate. Currently relatively low quality and condition with eroded and broken edges. Whole field highly sensitive in terms of local landscape character but E side of field less so. Close association with highly sensitive historic sector of village to N.

Visual Sensitivity: High to Moderate. Highly visible from Hills' ridges and properties on boundaries. Partly screened by hedge on E side of public fp in summer. Partly visible from public fp to S.

Overall Sensitivity: High to Moderate. Conservation Area, high visibility, valued local amenity but no public access to field.

Landscape Value: High to Moderate.

Function / Context / Comment: Conservation Area. Forms part of important green open space to N and W of residential area at Colwall Stone. Identified as 'significant open space' and 'green lung' in Village Design Statement. Part of setting of Colwall's Victorian industrial heritage. Site of old ice works and tramway beyond southern boundary. Grade II listed buildings close to N boundary and close association with historic sector of village. Well-used public footpath and hedge along track to W forming clear edge to village. Area's overall capacity from matrix was Low to Medium but was judged to be Medium / Low to Medium due to low value / function. Residential development potentially acceptable on this Area, but density, siting, layout and design of built form must respect and reflect the existing local settlement pattern, vernacular and sense of place.

Overall Capacity: Medium / Low to Medium.

LANDSCAPE SENSITIVITY	VISUAL SENSITIVITY	OVERALL SENSITIVITY	LANDSCAPE VALUE	OVERALL CAPACITY	
MODERATE	HIGH TO MODERATE	MODERATE	HIGH TO MODERATE	MEDIUM	LOW TO MEDIUM

AREAS 12B(1) & 12B(2)

Location: West side of settlement at Colwall Stone, south of Old Church Road.

General Description: Areas associated with / part of larger open sloping grassed field (see 12A). 12B(1) includes properties / gardens to N (along Old Church Rd) and to W; 12B(2) comprises site of Victorian ice works / tramway, with settlement edge to S. Some mature native & ornamental trees. Good hedge along track on W side.



Key Baseline Features: Conservation Area. Grade II listed buildings. Victorian industrial heritage buildings / features (ice works / tramway). Ag. / forestry buildings & coniferous plantation to SW. Strong influence of Hills to E but local setting mostly confined to boundaries. Public fp.

Landscape Sensitivity: High to Moderate. Mixed quality and condition - some eroded and broken edges but both areas highly sensitive in terms of local landscape character and existing edge of settlement. Important local heritage features, GI assets and vegetation.

Visual Sensitivity: High to Moderate. Highly visible from Hills' ridges. Partly screened by hedge on E side of public fp in summer. Partly visible from public fp to S.

Overall Sensitivity: High to Moderate. Conservation Area, high visibility, valued local amenity but currently no public access to field.

Landscape Value: High to Moderate.

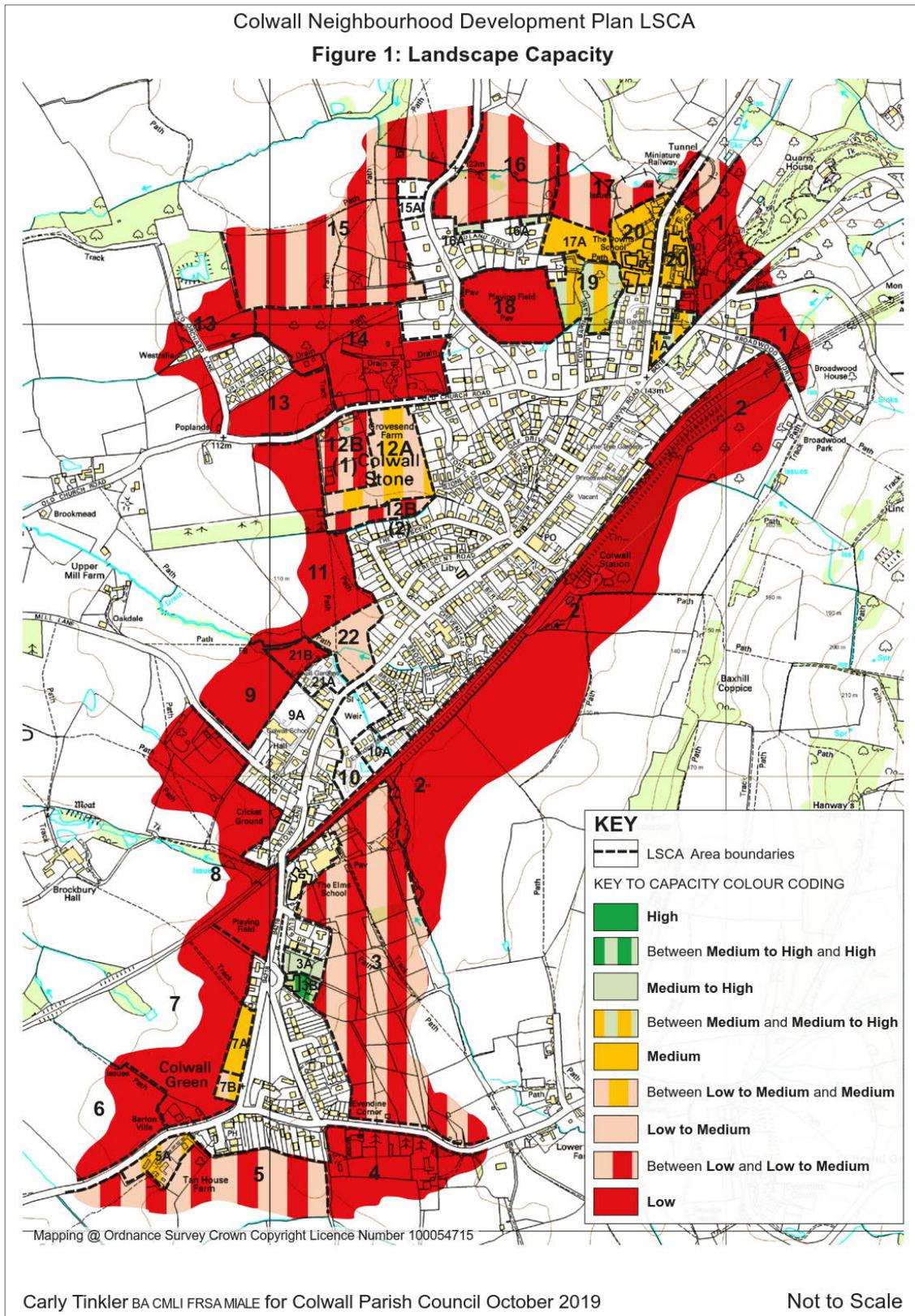
Function / Context / Comment: Conservation Area. Associated with / part of important green open space to N and W of residential area at Colwall Stone. Identified as 'significant open space' and 'green lung' in Village Design Statement. Part of Colwall's Victorian industrial heritage. 12B(2) is site of old ice works and tramway. 12B(1) includes Grade II listed building and closely associated with historic sector of village. Part of field shown as orchard on old maps. Well-used public footpath along track forming clear edge to village. Important GI assets. Development would have adverse effects on landscape character / visual amenity / GI - area not recommended for consideration. Levels of quality / value / GI function could be increased by creating new community green space in field with access from E and W, and restoring / protecting heritage assets.

Overall Capacity: Low to Medium / Low

LANDSCAPE SENSITIVITY	VISUAL SENSITIVITY	OVERALL SENSITIVITY		LANDSCAPE VALUE	OVERALL CAPACITY	
HIGH TO MODERATE	HIGH TO MODERATE	HIGH	MODERATE	HIGH TO MODERATE	LOW TO MEDIUM	LOW

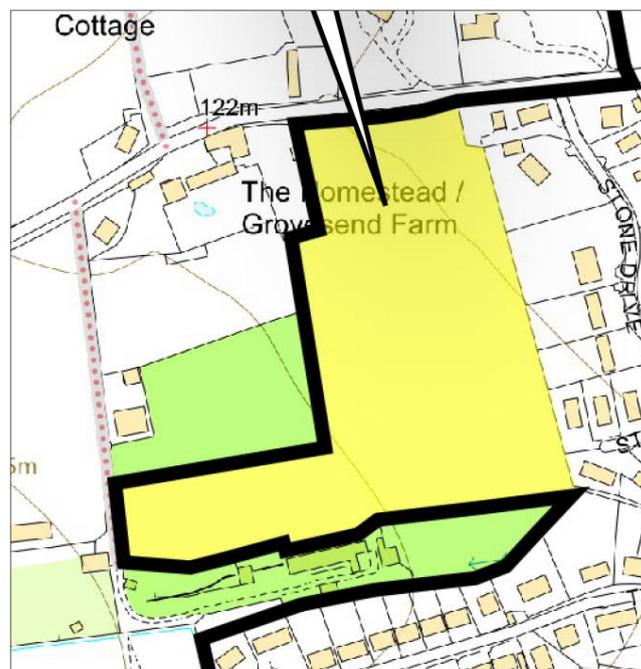
2.3.9 LSCA Figure 1: Landscape Capacity is reproduced as Map 3 in the NDP and as Map 1 below.

Map 1 LSCA Figure 1: Landscape Capacity



- 2.3.10 The site allocation for housing at Grovesend Farm is limited to Site 12A, which is considered to have Medium / Low to Medium capacity for development. The LSCA sets out that Area 12A's 'overall capacity from matrix was Low to Medium but was judged to be Medium / Low to Medium due to low value / function. Residential development potentially acceptable on this Area, but density, siting, layout and design of built form must respect and reflect the existing local settlement pattern, vernacular and sense of place.'
- 2.3.11 Area 12B (Parts 1 and 2) are assessed as having an overall capacity for development of Low to Medium / Low and the report sets out 'Development would have adverse effects on landscape character / visual amenity / GI - area not recommended for consideration. Levels of quality / value / GI function could be increased by creating new community green space in field with access from E and W and restoring / protecting heritage assets.' These more sensitive areas are not included in the site allocation for housing.
- 2.3.12 The proposed Site Allocation Policy CD4 Site 2 Grovesend Farm is shown on the extract from the Policies Map (Map 5 in the NDP) which is reproduced as Map 2 below. The yellow area indicates the site allocation for housing and the green areas are identified as Green Space.

Map 2 Grovesend Farm Site Allocation



- 2.3.13 Overall then, the proposed site allocation for new housing at Grovesend Farm should be retained in the NDP as it is the most suitable, appropriate and deliverable site available to enable the NDP to meet the housing requirement set out in the Core Strategy.
- 3.0 Key Points raised in Regulation 16 Responses
- 3.1 'New housing would lead to additional vehicular traffic on roads that are not suited such as a narrow road in Old Church Road and Stone Drive'
- 3.1.1 The Parish Council takes the residents' concerns about traffic very seriously and has carefully considered the issue.

- 3.1.2 Herefordshire is a rural area and a great deal of development is accessed by narrow country lanes; Colwall is no exception. Whilst the narrow lanes provide a poor service there is no evidence the narrow lanes in the parish are dangerous; over a 10-year period to 2014, all the injury accidents were on the A449, the B4218 Walwyn Road and B4232 Jubilee Drive. Also, almost all traffic related complaints received by the Parish Council are related to Walwyn Road and Jubilee Drive.
- 3.1.3 These lanes form an essential part of the rural character of the area, and widening schemes would impact adversely on this character and create short lengths of improved road that would only encourage increased speeds. Conversely, it would not be appropriate to only develop sites that were accessed from more main roads as it would lead to ribbon development, would not take account of the impact on the landscape nor the need for development to be within or adjacent to the main built-up area (Core Strategy Policy RA2).
- 3.1.4 The following has also been taken into account:
- That all the roads in the Parish have the capacity to absorb the additional traffic generated from the modest development required to meet the housing target;
 - There is no evidence that Mill Lane is more suitable than Old Church Road;
 - Discussions with the highway authority who confirmed in June 2017 it was content for a Grovesend development of up to 37 homes to go ahead "...subject to the provision of a safe and suitably surfaced (suitable for all seasons of the year) pedestrian link or links to the amenities and facilities of Colwall Village." This requirement is included in the Plan. Note also that the proposed number of homes is 32;
 - 35 homes are served by Orlin Road/Old Orchard Lane which is a narrow cul-de-sac and rarely causes any issues;
 - The 20 additional dwellings at Covent Garden, where there were concerns about the capacity of Brockhill Road and the impact on the Old Church Road junction. In the event there has been no discernible impact; and
 - The additional 12 new homes on Evendine Mews which together with the existing 23, total 35, which are served only by Brookmill Close. Again, the impact has been minimal. It is noted this cul-de-sac has now been extended by a further 10 dwellings.
- 3.1.5 It is therefore considered the addition of 32 homes to the short length of Old Church Road to Stone Drive is unlikely to create a significant issue and only a proportion of the traffic will then use Stone Drive. Old Church Road is shared use as there is no separate provision for pedestrians or cyclists. This can be a benefit if it is well-used by pedestrians, cyclists and horse-riders, as it significantly calms the traffic. Provision of a footway may appear beneficial but can just lead to increased traffic speeds in the belief pedestrians will not be in the carriageway. Nevertheless, the Plan requires "the provision of a safe and suitably surfaced (suitable for all seasons of the year) pedestrian link or links to the amenities and facilities of Colwall Village."

Furthermore, the highway authority will have to approve all the highway-related details of the development, including junctions, sight-lines and signage, and should include measures to slow traffic on Old Church Road.

- 3.2 Lack of safe pedestrian / cycle route to village centre
- 3.2.1 The Plan requires the developers of the Grovesend site to provide “a safe and suitably surfaced (suitable for all seasons of the year) pedestrian link or links to the amenities and facilities of Colwall Village.” The landowner, through their agent, has confirmed that ‘the site is suitable, available and achievable for housing development, and therefore [they] consider there are no insurmountable constraints to the delivery of the site during the plan period.’
- 3.3 ‘Unacceptable impact on Colwall Conservation Area, historical significance and loss of Green Space’
- 3.3.1 The Grovesend Farm site lies within the Colwall Conservation Area. The site includes an important open space on the edge of the built-up area which is valued by residents. It is bounded to the south and east by modern estate-type housing development which lies outside the Conservation Area boundary.
- 3.3.2 Development is permitted within Conservation Areas. The NPPF 2019, explains in section 16 Conserving and enhancing the historic environment, paragraph 192, that,
- ‘In determining applications, local planning authorities should take account of:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - c) the desirability of new development making a positive contribution to local character and distinctiveness.’
- Herefordshire Council Core Strategy Policy LD4 (Paragraph 5.3.24) – Historic environment and heritage assets sets out, amongst other things, that
- ‘Development proposals affecting heritage assets and the wider historic environment should:
1. Protect, conserve, and where possible enhance heritage assets and their settings in a manner appropriate to their significance through appropriate management, uses and sympathetic design, in particular emphasising the original form and function where possible.’
- Any future proposals coming forward for Grovesend Farm will be required to address national, Herefordshire Council and NDP planning policies in relation to conservation and design.
- 3.3.3 The proposed site allocation at Grovesend Farm limits the built form to those areas which are of least heritage interest, and which have the highest capacity for development in landscape terms.
- 3.3.4 The LSCA (2019) notes in the site assessments that Site 12B forms ‘part of Colwall’s Victorian industrial heritage. 12B(2) is site of old ice works and tramway. 12B(1) includes Grade II listed building and closely associated with historic sector of village. Part of field shown as orchard on old maps.’ New housing would be limited to Site 12A.

- 3.3.5 The proposed site allocation Policy CD4 Site 2 includes a range of criteria to protect built and heritage assets. These include that designs should be sensitive to the setting and context of the ice house, tramway and former orchard, and a buffer zone of native trees and shrubs and secure fencing should be provided along Area 12A's southern boundary in order to protect these assets and features. Consideration should also be given to effects on listed buildings in close proximity to the site.
- 3.3.6 In addition, the areas to the west and south of the proposed new housing are protected as Green Space as part of the development scheme. Overall, much of the open space, which is cited as a "green lung" in representations and objections, is retained in the proposal. Policy CD4 Criteria 6 requires enhancement of the landscape and ecology, and provision of additional green infrastructure for the benefit of local residents, including a 'green corridor' from the new road through Site 2 to the greenspace to the west, allowing access for pedestrians and maintenance vehicles.
- 3.3.7 It is particularly worth noting that Historic England are fully supportive of the Colwall NDP. In their response to the Regulation 16 consultation, they note 'that the selection of sites with the potential for new housing development has been positively guided by considerable research including the Village Design Statement (2001) and the Landscape Assessment and associated stage 2 Landscape Sensitivity and Capacity Assessment (Tinkler 2013). This and other documentation produced by the Malvern Hills AONB provides a very thorough evidence base for the policies and proposals put forward. It is also clear that specific policies for individual development sites provide for thorough mitigation against potentially adverse impacts upon the rural and built environment including heritage assets and the Colwall conservation area.'
- 3.3.8. Overall the Parish Council is mindful of the potential impact of the development on the Conservation Area, but the proposed site allocation provides an opportunity to guide proposals and help ensure a high-quality scheme which protects and enhances built and natural environment assets.
- 3.4 'Over-reliance on the LSCA in decisions about sites and insufficient consideration of local residents' objections'
- 3.4.1 A number of responses expressed concerns about the pre-eminence of the LSCA in decisions about site allocations and the apparent lack of consideration given to local residents' objections.
- 3.4.2 The NPPF sets out that great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs.
- 3.4.3 The LSCA and subsequent Colwall Visual Study Report, 2019 are a very important part of the NDP's technical evidence base and have been used to inform decisions about site allocations and planning policies in the NDP. The studies used accepted methodologies to provide objective and subjective assessments. It is appropriate that the Parish Council considered the assessments and recommendations in the reports and used the findings to inform the decision-making process. At the same time, other research, consideration of technical information and landowner engagement all contributed to decisions about site allocations.
- 3.4.4 The Consultation Statement sets out in detail how and when local residents and stakeholders have been informed and invited to engage in the NDP process. There were

objections to the proposed development of new housing at Grovesend Farm during the Regulation 14 public consultation, but also a significant number of respondents supported the NDP and the proposed site allocation. The various issues and concerns raised were given careful consideration and led to review and amendment to the Plan's Policies and the specific criteria for Site 2. It was considered that the principle of development on the site was acceptable, provided that detailed proposals properly addressed the NDP policies through the development management process.

- 3.4.5 At the end of the day, therefore, the Parish Council took an informed decision to include the site in the Submission Plan, even though there were objections from some local residents.

4.0 Conclusion

- 4.1 The Parish Council maintains that the proposed site allocation Policy CD4 Site 2 Grovesend Farm (approximately 32 houses) should be retained in the Colwall NDP.
- 4.2 The site would deliver a significant contribution to the indicative housing requirement for Colwall over the Plan period.
- 4.3 In allocating this site the Plan extends the Settlement Boundary into the open country and it is therefore inevitable the proposed development will significantly impact on those properties that currently lie on the settlement edge. Those residents affected by this proposed development have understandably objected to the site allocation, but this has to be balanced against the impact on the AONB which has been the paramount concern throughout the Plan development process.
- 4.4 The LSCA considered the impacts of development on this site on landscape character and visual amenity, especially that of a) local residents and b) the AONB and concluded that it had a greater capacity for development than other areas around Colwall.
- 4.5 The criteria in the proposed site allocation set out in detail how developments should consider and mitigate the impacts on heritage and requires the provision of pedestrian / cycle access to the village centre, to reduce reliance on the car.
- 4.6 The LSCA also concluded that 'Levels of quality / value / GI function could be increased by creating new community green space in the field with access from E and W and restoring / protecting heritage assets'. There is currently no public access to these areas, so providing it would be of benefit to the local community, and now forms part of NDP policy.