

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 Lane<sup>1</sup>, 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.

---

<sup>1</sup> 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](http://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 1<sup>st</sup> February 2018 to 18<sup>th</sup> 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.**

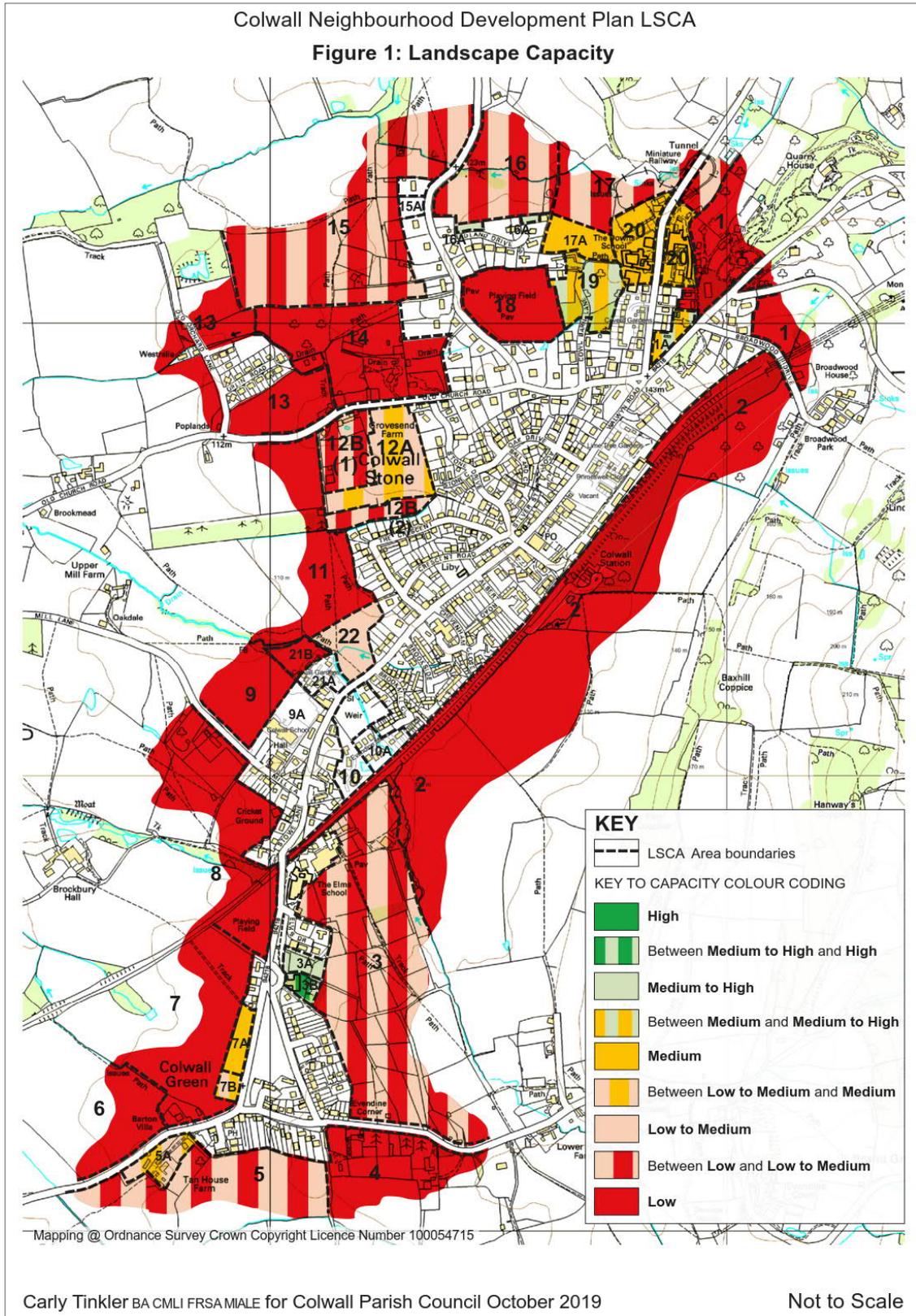
**Function / Context / Comment:** Conservation Area. Associated with / part of important green open space to N and W of residential area at Colwall Stone. Identified as 'significant open space' and 'green lung' in Village Design Statement. Part of Colwall's Victorian industrial heritage. 12B(2) is site 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

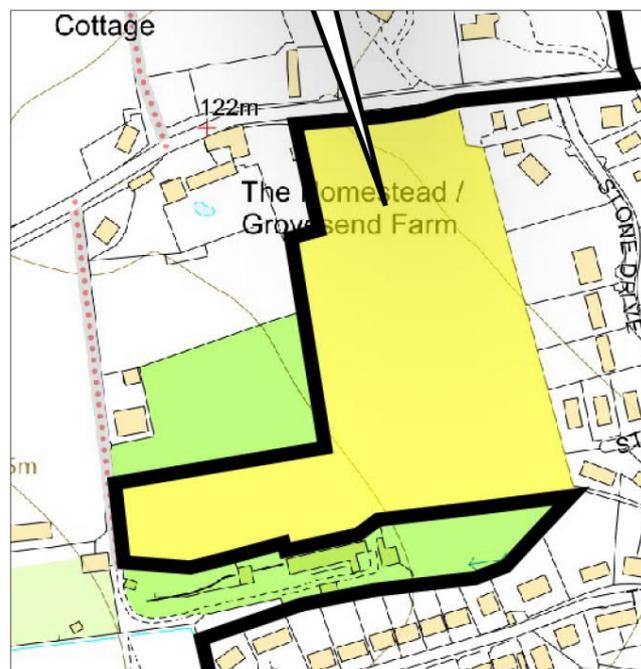
2.3.9 LSCA Figure 1: Landscape Capacity is reproduced as Map 3 in the NDP and as Map 1 below.

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.