

**Statement of Common Ground between the
South Worcestershire Councils (Malvern Hills District
Council, Wychavon District Council and Worcester City
Council), West Mercia Police and Crime Commissioner,
West Mercia Police and Hereford & Worcester Fire and
Rescue Service**

Re. Hindlip Park

Date: 07 February 2025



1. Introduction

- 1.1 In accordance with the NPPF (paragraph 24)¹, public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out above. This forms part of each local planning authority's evidence for their respective emerging Local Plans.
- 1.2 This SoCG has been prepared to fulfil the duty to cooperate requirements in accordance with paragraph 27 of the NPPF² and the section of the Planning Practice Guidance on Maintaining Effective Cooperation.

2. Purpose

- 2.1. This Statement of Common Ground (SoCG) has been produced to support the South Worcestershire Development Plan Review (SWDPR), which has been jointly prepared by the South Worcestershire Councils (SWCs) - Malvern Hills District Council, Wychavon District Council and Worcester City Council. It sets out how the SWCs have engaged with the West Mercia Police and Crime Commissioner (WMPCC), West Mercia Police (WMP) and Hereford & Worcester Fire and Rescue Service (HWFRS) in order to fulfil its Duty to Cooperate requirements.

3. Scope

- 3.1. Planning Practice Guidance (PPG)³ provides details on the scope of a Statement of Common Ground (SofCG), which is detailed below.
 - a short description and map of the administrative areas covered by the statement;
 - the key strategic matters being addressed by the statement;
 - the plan-making authorities responsible for joint working detailed in the statement, and list of any additional signatories;
 - governance arrangements for the cooperation process;
 - if applicable, the housing requirements in any adopted and (if known) emerging strategic policies relevant to housing within the area covered by the statement;
 - distribution of needs in the area as agreed through the plan-making process, or the process for agreeing the distribution of need (including unmet need) across the area;
 - a record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these; and
 - any additional strategic matters to be addressed by the statement which have not already been addressed.

¹ 'Local planning authorities and county councils are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries' (NPPF, 2024, Para 24)

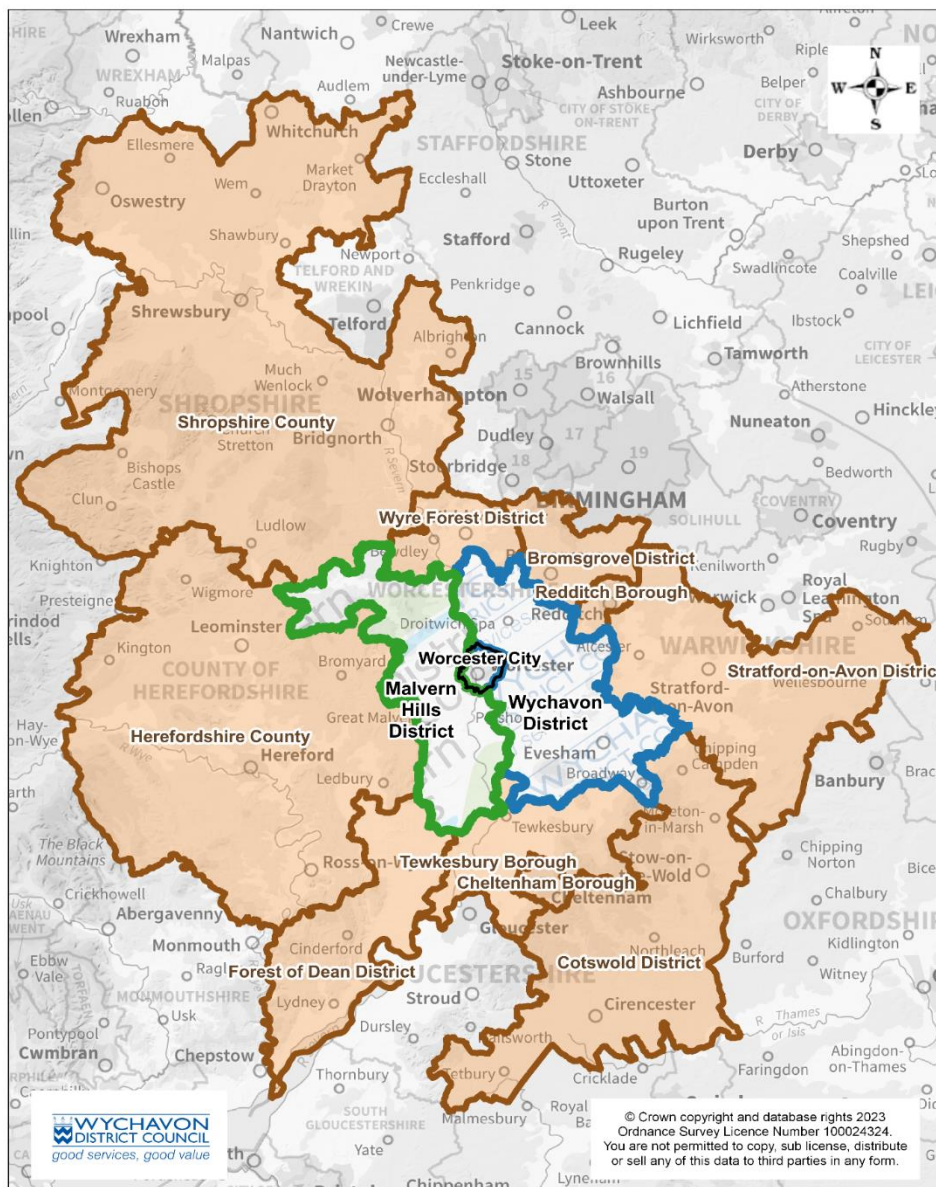
² 'In order to demonstrate effective and on-going joint working, strategic policy making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency'

³ Paragraph: 011 Reference ID: 61-011-20190315 (Plan-making PPG)

3.2. The PPG also recognises that the ‘level of cooperation detailed in the statement is expected to be proportionate to the matters being addressed. The statement is expected to be concise and is not intended to document every occasion that strategic policy-making authorities meet, consult with each other, or for example, contact prescribed bodies under the duty to cooperate. The statement is a means of detailing key information, providing clear signposting or links to available evidence on authorities’ websites.’⁴⁴

4. Strategic Geography

4.1. The SWCs are Malvern Hills District Council, Wychavon District Council and Worcester City Council all located within Worcestershire county as shown on the following map:



⁴⁴ Paragraph: 011 Reference ID: 61-011-20190315, Plan-making PPG

5. Duty to Cooperate

South Worcestershire Development Plan Review

- 5.1. The Development Plan for the SWC currently comprises the South Worcestershire Development Plan (SWDP, adopted 2016), Local Transport Plan 4 (LTP, 2017), Minerals Local Plan (2022), Worcestershire Waste Core Strategy (2012), together with made Neighbourhood Plans. The SWDP was prepared jointly by the three SWCs working together under plan making arrangements. On completion of the SWDP Review process, the SWDP will be replaced by the 'South Worcestershire Development Plan Review, 2021-2041' (SWDPR).
- 5.2. The SWDPR includes strategic and detailed policies, together with site allocations for the Plan period 2021 to 2041.
- 5.3. There have been discussions between the SWCs, WMPCC, WMP and HWFRS during the SWDPR process concerning Hindlip Park.
- 5.4. As part of the development of the SWDPR, the SWCs have held public consultations:
 - Traveller and Travelling Showpeople Site Allocations DPD Preferred Options - consultation concluded on 9 May 2016.
 - Traveller and Travelling Showpeople Site Allocations DPD Revised Preferred Options - consultation concluded on 18 April 2018.
 - Village Facilities and Rural Transport Proposed Methodology - consultation concluded on 2 July 2018.
 - SWDPR Call for Sites and Proposed SHELAA Methodology - consultation concluded on 2 July 2018.
 - Sustainability Appraisal Scoping Report - consultation concluded on 3 July 2018.
 - Development Boundaries Review Proposed Methodology - consultation concluded on 8 October 2018.
 - SWDPR Issues and Options - consultation concluded on 17 December 2018.
 - SWDPR Preferred Options - consultation concluded on 16 December 2019.
 - Renewable and Low Carbon Energy Call for Sites - consultation concluded on 3 April 2020.
 - Country Park Call for Sites - consultation concluded on 24 July 2020.
 - SWDPR Further Regulation 18 (III) Sustainability Appraisal Consultation - consultation concluded on 19 April 2021.
 - Traveller and Travelling Showpeople Site Allocations DPD Revised Preferred Options - consultation concluded on 5 July 2021.
 - SWDPR Regulation 19 – consultation concluded on 23 December 2022.
 - Traveller and Travelling Showpeople Site Allocations DPD Publication – consultation concluded on 13 December 2022.
- 5.5. Duty to Cooperate discussions will continue at appropriate times as the SWDPR progresses.

6. Key Strategic Matters

6.1 The following key issue in the SWDPR has been jointly identified by the parties and is the subject of this SoCG:

- Hindlip Park

6.2 The operational core of Hindlip Park is a Regional Emergency Services and Civil Resilience Site within the Green Belt. Hindlip Hall itself is a Grade II* listed building. It is a mixture of previously developed land and Greenfield land, approximately 12ha in size. The site employs over 1,500 personnel, conducting a range of operational, strategic, administrative, conference, and training duties. It has been the WMP's headquarters since 1967 and a joint headquarters with HWFRS since 2018.

6.3 In respect of WMP, personnel are employed in a comprehensive range of functions including those focused on strategic and tactical command, forensics, emergency and other call handling, Police and Crime Commissioner duties, administration and data handling, operational policing and support, and ensuring adherence to, and monitoring, of professional standards. The operational core is also important to WMP in terms of training; this includes the training of firearms officers, police dogs and the hosting of training courses for students and externally based members of staff.

6.4 HWFRS's personnel are concentrated within a joint Police and Fire Operations and Communication Centre (OCC), which was completed in 2018. Other HWFRS personnel, including Chief Officers, are based at Hindlip Hall. HWFRS's personnel are employed on rotating shifts and are responsible for undertaking duties in respect of fire prevention, safety, firefighting and rescue operations. For example, HWFRS's Fire Control Team handles 10,000 emergency calls each year and is responsible for co-ordinating frontline responses and monitoring activity.

6.5 Hindlip Park is a site of regional and national importance in respect of ensuring public safety. The operational emergency service functions that are provided at Hindlip Park are vital to the communities served and can be expected to evolve in meeting new and ever greater challenges. The need for planning policies to promote public safety by recognising and supporting development required for operational defence and security purposes is made clear within paragraph 97(b)⁵ of the NPPF. Furthermore, paragraph 20(b)⁶ of the NPPF sets out that strategic policies should make sufficient provision for security infrastructure.

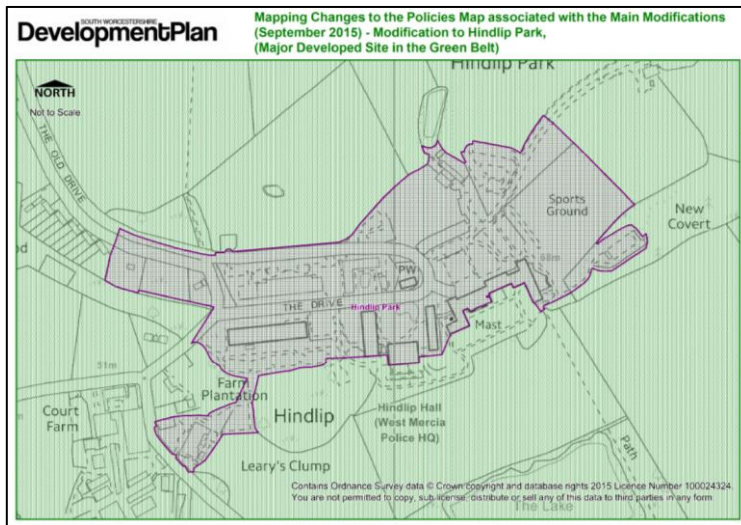
6.6 As a hub for emergency services, civil resilience and preparedness, Hindlip Park's role will continue growing now and into the future. Furthermore, as the police and fire & rescue services seek to maximise the usage of their existing estate, additional personnel will be accommodated in the operational core of the site.

6.7 At present, proposals are advancing for the creation of a 50-metre indoor range on the existing range, and for the existing firearms school to be refurbished and extended.

⁵ Now paragraph 102(b) of the December 2024 NPPF

⁶ Paragraph number the same in the September 2023 and December 2024 editions of the NPPF

6.8 Within the adopted South Worcestershire Development Plan (SWDP, 2016), Hindlip Park is allocated as a Major Developed Site (MDS) restricted to limited infilling and the redevelopment of previously developed land within the identified site boundary for emergency and civil resilience provision only (SWDP2). This is shown on the image below (not to scale):



6.9 Hindlip Park is referenced within the SWDPR under Part F of policy SWDPR 04: Green Belt which states:

Hindlip Park is a Regional Emergency Services and Civil Resilience Site within the Green Belt and new development proposals for these uses are considered to be capable of demonstrating very special circumstances. Therefore, proposals for the redevelopment or intensification of the site will be supported that:

- i. Are limited to within its core site boundary as set out on the Policies Map;*
- ii. Utilise previously developed land first where possible; and*
- iii. Minimise and mitigate against any adverse impact on the openness of the Green Belt.*

6.10 The accompanying Reasoned Justification explains (para 4.8 to 4.10):

Whilst proposals for the redevelopment and intensification of the site for police and emergency services purposes may represent inappropriate development in terms of Green Belt policy guidance within the NPPF, the councils recognise the importance of the site, its locational advantages and the need to potentially upgrade and expand its facilities. It is therefore considered that proposals for redevelopment and intensification of the site for emergency response and operational policing are capable of demonstrating very special circumstances.

This policy support provided to development proposals for operational policing or partner emergency service uses. All other forms of development will be considered against full Green Belt policy in accordance with the SWDPR and NPPF.

Development proposals for police and partner uses will be expected to be sited within the core site area as defined on the Policies Map, whilst minimising harm to

the remainder of the Green Belt through appropriate design, layout and landscaping measures.

6.11 WMPCC, WMP and HWFRS submitted an objection at the SWDPR Regulation 19 review stage, stating SWDPR 04 was unsound and unjustified for the following reasons. In the absence of the MDS designation the SWDPR 04 policy wording of relevant uses being capable of very special circumstances neither removes the test or reduces the uncertainty for WMPCC, WMP and HWFRS. The policy is ineffective and does not provide the flexibility for future emergency services and civil resilience uses to be delivered at Hindlip Park, which impacts upon public safety.

6.12 WMPCC, WMP and HWFRS consider it unacceptable that they would have to demonstrate very special circumstances for any further development at Hindlip Park. Hindlip Park is a site of regional and national importance in delivering emergency services, civil resilience and ensuring public safety. It is therefore essential that Hindlip Park can continue to be developed for these purposes. A summary of the main points within the response are as follows (South Worcestershire Development Plan Review Response to Publication Stage Consultation, December 2022):

- Based on the proposed policy, it would be unclear as to what status the site would have for decision-taking purposes. In the absence of a site-specific MDS or inset policy, the tests set out in paragraph 145 [now paragraph 149]⁷ of the NPPF would have to be considered when determining any proposal for development.
- The wording of former paragraph 145(g) of the NPPF [as replicated in paragraph 149(g)]⁸, requiring that development must not have a greater impact on the openness of the Green Belt, was inconsistent with the term 'no significant detrimental impact' set out in draft Policy SWDPR 2. For that reason, it would not be consistent with paragraph 35(d)⁹ of the NPPF.
- There was [and remains] fundamental disagreement with the findings of the Green Belt Assessment Part 1 and Technical Note 1 as to the extent to which the operational core at Hindlip Park can be considered to maintain the openness of the Green Belt in that location. WMPCC, WMP and HWFRS do not accept the findings of the Green Belt Assessment Part 1 and Technical Note.
- If the site were not to be inset or designated as an MDS within the Green Belt, a decision-maker would be required to consider any land within the operational core as greenfield, Green Belt land. Therefore, any proposal for infilling or development on PDL in the operational core could be weighed with undue negativity having regard to an evidence base that perceives the site to be more open than it actually is. This would create uncertainty, potentially preventing the delivery of new infrastructure to meet vital emergency services and civil resilience needs.

⁷ Now paragraph 154 of the NPPF 2024

⁸ Now replaced by amended paragraph 154(g) of the NPPF 2024

⁹ Now paragraph 36(d) of the NPPF 2024

- Deferring to paragraph 149 of the NPPF¹⁰ in the determination of development proposals would create a conflict, as there would be no flexibility to enable the replacement and expansion of service provision at Hindlip Park if the tests set out in that paragraph were to be applied.
- In the absence of a site-specific policy (to accompany an inset or MDS status for the site), there would be no guidance afforded to the decision-maker as to how a proposal should be weighed in the planning balance.
- The requirement to produce an SPD, whose preparation and adoption after the adoption of the SWDPR would mean a ‘policy vacuum’ in the intervening period, would delay and hinder the decision-taking process and therefore is not supported. A similar requirement put to the Inspector of the SWDP by the Council and debated during the EiP, where it was rejected and therefore not carried forward in the adopted plan.

SWC Response

- 6.13 Following positive discussions between the parties, the SWCs agree that the core area of Hindlip Park should be defined by an emergency services and civil resilience allocation in the SWDPR. The boundary for which shall be as shown on the agreed plans enclosed with this SoCG [**please see maps in section 7: Matters of Agreement**], which is justified by the accepted evidence submitted by WMPCC, WMP and HWFRS.
- 6.14 The agreed plan will be accompanied by the agreed amended wording for SWDPR 04(F), which is shown below:

SWDPR 04: Green Belt

F. Hindlip Park is a Regional Emergency Services and Civil Resilience Site located within the Green Belt. New development should:

- i. Be limited to within the core boundary as set out on the Polices Map;
- ii. Be restricted to limited infilling and the redevelopment of previously developed land for emergency and civil resilience uses only; and
- iii. **[The amended text for this specific part of the policy is not agreed, please see section 8 below]**

- 6.15 It is considered that this will allow appropriate development to be approved without the need to demonstrate very special circumstances, therefore, overcoming the concerns raised by WMPCC, WMP and HWFRS.

¹⁰ Now paragraph 154 of the NPPF 2024

6.16 The agreed amended wording for SWDPR 04(F) will be accompanied by the following agreed amended wording for the Reasoned Justification:

Reasoned Justification for SWDPR 04

- 4.4 In general, sites have not been allocated within the Green Belt, but there are exceptions in Worcester City and Wychavon. For Worcester City, employment allocation 'Land at Blackpole Road (SWDP New 10)' has been allocated due to the combined factors of the site's location, restricted development opportunities (because of physical factors and a lack of suitable employment land availability options) and the evidence in the South Worcestershire Green Belt Study, which indicated that the harm to the Green Belt in this location is 'limited to moderate' suggesting an allocation could be supported. For Wychavon, the core of Hindlip Park is allocated as a Regional Emergency Services and Civil Resilience Site. There are also a number of small employment sites that have been allocated around Hartlebury Trading Estate and do not extend in the Green Belt beyond the current boundaries of the Trading Estate.
- 4.5 **[The inclusion of this paragraph is not agreed, please see section 8 below].**
- 4.6 Hindlip Park is located in the Green Belt to the north of Worcester and has a lengthy planning history with respect to emergency services provision since its first use by the police in 1947. Currently it is the joint headquarters of West Mercia Police (WMP) and Hereford & Worcester Fire and Rescue Service (HWFRS). It is a mixture of Previously Developed Land and extensive greenfield land totalling approximately 124ha and is likely to be the subject of further development proposals from WMP and HWFRS. In recognition of this, the core area of Hindlip Park (approximately 12ha) is allocated as a Regional Emergency Services and Civil Resilience Site. This is shown on the Policies Map. It includes several buildings of various sizes and ages, included Grade II* Listed Hindlip Hall, as well as extensive areas of hardstanding and car parks. Beyond this allocated core area the surrounding parkland include mature woodland, hedgerows, ponds and arable land leased to an agricultural tenant.
- 4.7 The Councils recognise the national and regional importance of Hindlip Park for the emergency services and civil resilience. The site's central location within the operational area together with its direct access to the motorway and major road systems are key factors in this regard and enable swift response times in emergencies.
- 4.8 Whilst proposals for the redevelopment and intensification of the site for emergency services and civil resilience purposes may represent inappropriate development in terms of Green Belt policy guidance in the NPPF, the councils recognise the importance of the site, its locational advantages and the need to potentially upgrade and expand its facilities. This is why it is accepted that Hindlip Park's facilities may need to be upgraded with limited infilling within the allocated core area during the lifetime of the SWDPR. Proposals for the site will be expected to comply with the criteria in SWDPR 04(F).

4.9 [It is agreed this paragraph should be deleted.]

4.10 [It is agreed this paragraph should be deleted.]

6.17 The Duty to Cooperate has been progressed in a positive and progressive manner by all parties to this SoCG. Whilst this SoCG identifies two outstanding areas where there remains some disagreement between the parties, it is considered that this does not represent a failure of the Duty to Cooperate process, but instead are issues which can be discussed through the Examination.

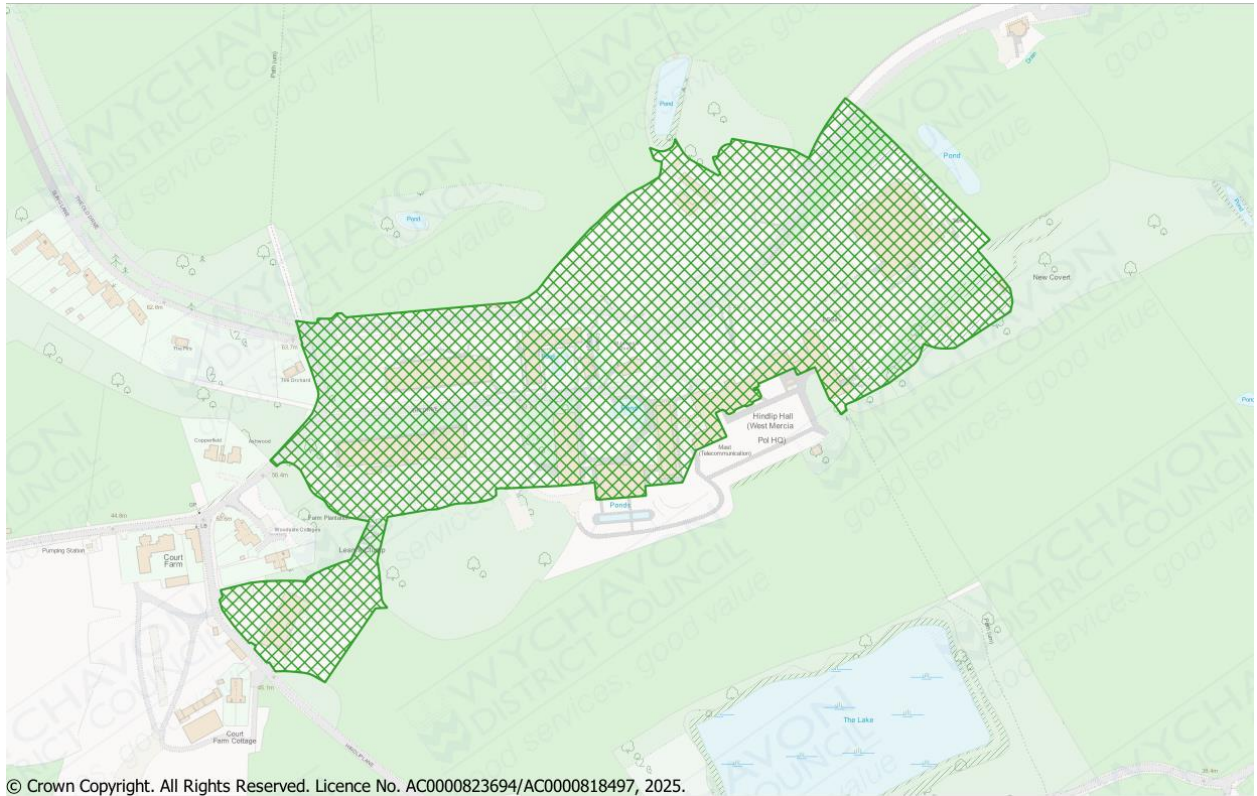
7 Matters of Agreement

- 7.1 All of the amended wording for SWDPR 04(F), with exception of F(iii), its Reasoned Justification stated in Section 6 of this SoCG, and the maps of the core area (as shown below), is agreed between the SWC's (Malvern Hills District Council, Wychavon District Council and Worcester City Council), WMPCC, WMP and HWFRS.

Lichfields Submitted Plan of Hindlip Park Core Area



Plan of Hindlip Park Core Area using SWC mapping base



8 Matters of Disagreement

8.1 There are two remaining areas of disagreement between the SWCs (Malvern Hills District Council, Wychavon District Council and Worcester City Council), WMPCC, WMP and HWFRS. These are as follows:

8.2 The first is that WMPCC, WMP and HWFRS request that part (iii) of SWDPR 04(F) be amended as follows to avoid the significant policy conflict with paragraph 154(g) of the National Planning Policy Framework (December 2024) (NPPF) caused by its current wording (they will provide their reasoning for this via their Hearing Statement on SWDPR 04):

SWDPR 04: Green Belt

(F) (iii) Not cause substantial harm to the openness of the Green Belt.

8.3 The SWCs request instead that the wording of part (iii) of SWDPR 04(F) be amended as follows, as this would be consistent with the September 2023 edition of the NPPF, which was in effect at the time of the submission of the SWDPR:

SWDPR 04: Green Belt

(F) (iii) Have no greater impact on the openness of the Green Belt than the existing development.

8.4 The second area of disagreement concerns paragraph 4.5 of the Reasoned Justification to SWDPR: 04, which states:

Impact of development proposals on openness of the Green Belt

4.5 The following will be taken into account in assessing the acceptability of all development proposals in terms of the Green Belt impact:

- a. The footprint, volume, height, bulk and location of the proposed buildings and ancillary development compared to the existing development on the site;
- b. In the case of replacement buildings, whether the development is located on or close to the site of the existing development or whether an alternative location within the site would have less impact on the Green Belt; and
- c. In the case of infilling, whether the development is in proportion with the existing buildings and does lead to a significant or unacceptable increase in the developed parts of the site.

- 8.5 The SWCs consider that paragraph 4.5 should be retained, as it is consistent with the September 2023 edition of the NPPF, which was in effect at the time of the submission of the SWDPR.
- 8.6 The WMPCC, WMP and HWFRS consider that paragraph 4.5 should be deleted, because it is contrary to the December 2024 and September 2023 editions of the NPPF. They will provide their reasoning for this via their Hearing Statement on SWDPR: 04.




9 Conclusions

9.1 The parties agree that:

- i) The South Worcestershire Councils (Malvern Hills District Council, Wychavon District Council and Worcester City Council) have fulfilled their Duty to Cooperate with the West Mercia Police and Crime Commissioner, West Mercia Police and Hereford & Worcester Fire and Rescue Service.
- ii) The parties will continue to work positively together and where relevant with other prescribed bodies on strategic cross boundary issues.

10 Signatories

10.1 This SoCG has been agreed and signed by the following:

<p>South Worcestershire Councils</p> <p>Name: Ian MacLeod</p> <p>Position: Director of Planning and Infrastructure, Malvern Hills District Council and Wychavon District Council</p> <p>Date agreed: 10.02.2025</p> <p>Signature:</p>  <p>And,</p> <p>Name: Duncan Rudge</p> <p>Position: Head of Planning, Worcester City Council</p> <p>Date agreed: 10.02.2025</p> <p>Signature:</p> 	<p>West Mercia Police and Crime Commissioner; West Mercia Police; and Hereford & Worcester Fire and Rescue Service</p> <p>Name: Andrew Morgan MRTPI</p> <p>Position: Strategic Planning Manager</p> <p>Date agreed: 06 February 2025</p> <p>Signature:</p> 
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