

**Statement of Common Ground between the South
Worcestershire Councils (Malvern Hills District Council,
Wychavon District Council and Worcester City Council)
and Stratford-on-Avon District Council relating to the
South Worcestershire Development Plan review**

Date: 20 February 2025



1. Introduction

- 1.1. The Localism Act 2011 places a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis. The duty requires that engagement should be constructive, active and ongoing. It requires co-operation to take place and is for the mutual benefit of neighbouring authorities. Importantly, Councils are expected to cooperate on strategic matters.
- 1.2. As well as the legal requirements set out in the Localism Act, the National Planning Policy Framework (2023) (the NPPF)¹, sets out the national policy regarding the Duty. 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.
- 1.3. This Statement of Common Ground (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 (PPG) on Maintaining Effective Cooperation³.

2. Purpose

- 2.1. This 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. The SoCG sets out how the SWCs have engaged with Stratford-on-Avon who prepared and adopted the 2016 Stratford-on-Avon Core Strategy and are currently working on the joint South Warwickshire Local Plan with Warwick District Council. In so doing, the SoCG is able to fulfil each of parties Duty to Cooperate requirements with respect to the SWDPR.

3. Scope

- 3.1. The PPG⁴ provides details on the scope of a SoCG, which are 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;

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, 2023, 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 Planning Practice Guidance: Plan-making (paragraphs 009 to 075): <https://www.gov.uk/guidance/plan-making#plan-reviews>

⁴ Paragraph: 011 Reference ID: 61-011-20190315 (NPPF, 2021)

- 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.

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.'*⁵

4. Relevant Local Authorities and Geography

- 4.1. The relevant Local Authorities to this SoCG are the SWCs (Malvern Hills District Council, Wychavon District Council and Worcester City Council) and Stratford-on-Avon District Council.
- 4.2. The administrative areas of Malvern Hills District Council, Wychavon District Council and Worcester City Council are located in Worcestershire. Malvern Hills / Wychavon District Council's administrative area adjoins Stratford-on-Avon District Council, which is in the county of Warwickshire.
- 4.3. As the South Worcestershire Councils and Stratford-on-Avon District Council are neighbouring planning authorities, it is important that effective duty to cooperate discussions are undertaken between them regarding strategic planning matters that cross administrative boundaries, during the South Worcestershire Development Plan Review.
- 4.4. Figure 1 illustrates the location of the South Worcestershire Councils and Stratford-on-Avon District Council:

⁵ PPG on Plan-Making. Paragraph: 011 Reference ID: 61-011-20190315

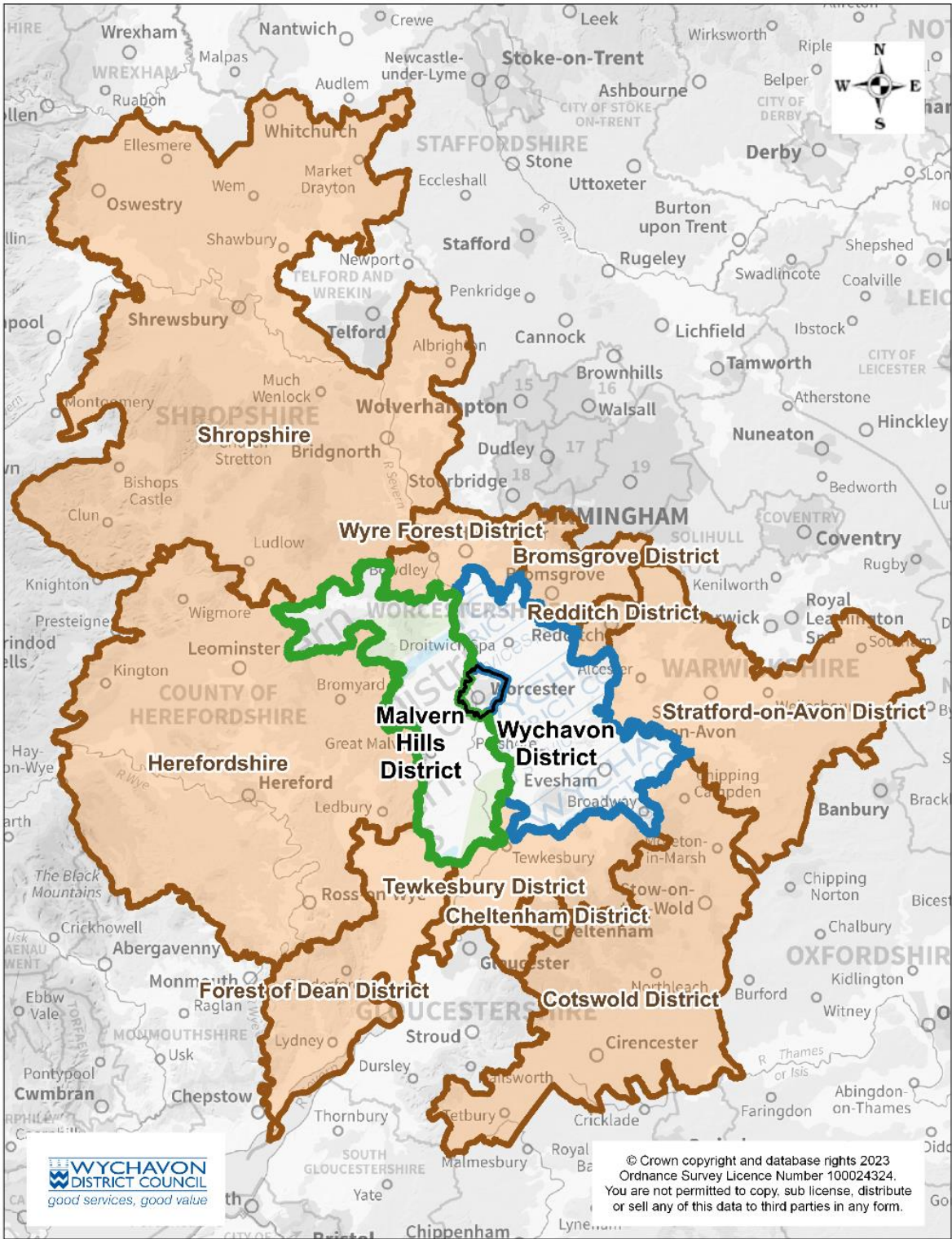


Figure 1 Map of SWCs and Neighbouring Authorities

5. Duty to Cooperate

South Worcestershire Development Plan Review

- 5.1. The Development Plan for the SWCs 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 has been ongoing and active engagement between the SWCs and Stratford-on-Avon District Council throughout the SWDPR process and duty to Cooperate discussions have occurred at appropriate times during the SWDPR process.
- 5.4. As part of the development of the SWDPR the SWCs have consulted Stratford-on-Avon District Council during the following 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 issues have been identified in the Duty to Cooperate dialogue and consultation between the SWCs and Stratford-on-Avon District Council.
- 6.2. It is considered that the Duty to Cooperate process has been progressed in a positive and progressive manner by both bodies. The SoCG examines key strategic matters and concludes there is board agreement on how matters will be addressed.
- 6.3. Stratford-on-Avon District Council did not raise any issues in terms of soundness or legal compliance during the SWDPR Regulation 19 consultation.

Housing Market Area

- 6.4. The area covered by the SWCs is considered to represent a broadly self-contained housing market area (HMA) in terms of migration and travel to work.
- 6.5. However, it is acknowledged that the duty to cooperate is not restricted to just Local Planning Authorities within the same HMA. As such, the SWCs and Stratford-on-Avon District Council have liaised closely during the SWDPR process, in accordance with the duty to cooperate.

Housing Need and Requirement

- 6.6. Using the Government's standard method calculation (using the 2022 baseline data and median workplace-based affordability ratio published in 2023), the housing requirement for the SWCs is currently 1,293 dwellings per annum (equating to 25,860 dwellings over the 20 year period from 2021–2041). The assessment of need will be kept under review.
- 6.7. In summary, the SWCs are proposing to meet the entirety of their local housing need (LHN) within the South Worcestershire HMA area and are therefore not seeking Stratford-on-Avon District Council to meet any of their need.

Employment Land Requirement

- 6.8. The EDNA, published in March 2022 (ECO1) has been updated in the EDNA Addendum and supported by an Economic Development Needs Topic Paper (EXAM26). The October 2024 Economic Development Needs Assessment Addendum (EXAM25) at para. 3.35 identifies a revised recommended requirement of employment land of 313.8ha. This is compared to supply in March 2023, which was 279.73ha (including employment allocations, mixed-use allocations and strategic sites). Therefore, a further need for employment land is required, which can come through commitments and being brought forward through the SWDP Review. The SWCs propose to meet the entirety of their employment land requirement within South Worcestershire and are therefore not seeking Stratford-on-Avon District Council to meet any of their need.

Distribution of Development

- 6.9. Policy SWDP 02 of the adopted SWDP (2016) sets out the development strategy and settlement hierarchy for South Worcestershire to 2030. SWDP 02 focuses most development on the main urban areas (Worcester city and the towns of Droitwich Spa, Evesham, Malvern, Pershore, Tenbury Wells and Upton upon Severn), where both

housing needs and accessibility to lower-cost public services are greatest. In order to deliver the social objectives of sustainable development, the adopted SWDP directs some growth to rural settlements (Category 1, 2 and 3 villages) that enjoy some local facilities and services.

- 6.10. Emerging Policy SWDPR 03 in the SWDPR sets out the revised development strategy and settlement hierarchy for south Worcestershire for the period 2021-2041. The revised strategy for the pattern and scale of additional development focuses as much of the additional growth as possible within easy reach of existing or proposed new rail stations in order to facilitate rail travel and reduce dependence on the private car. The SWDPR focuses the majority (8,000 new dwellings) of the additional circa 11,000 dwellings required at three new or expanded settlements - Worcestershire Parkway centred around Worcestershire Parkway rail station (5,000 dwellings), Throckmorton Airfield with proposed improved access to Pershore rail station (2,000 dwellings) and Rushwick with a proposed new rail station (1,000 dwellings). The circa 12,300 dwellings is the LHN for 2021-2041 at 25,860 dwellings plus the additional 500 dwellings at Mitton, minus outstanding deliverable SWDP allocations, commitments and an appropriate windfall allowance, and a 10% additional buffer.
- 6.11. Whilst the SWDPR proposes the majority of new dwellings in the main urban areas and new or expanded settlements, in order to deliver the social objectives of sustainable development, the SWDPR continues to direct some growth to rural settlements that enjoy some local facilities and services. The SWDPR proposes around 1,445 new dwellings across Category 1, Category 2 and Category 3 villages.
- 6.12. Stratford-on-Avon District Council support the general approach in the adopted SWDP of focusing development in the larger urban areas where there is typically better access to existing infrastructure and services and the approach of the SWDPR of focussing as much of the additional growth as possible within easy reach of existing or proposed new rail stations to facilitate rail travel and reduce dependence on the private car. It is acknowledged that additional infrastructure will be required to support the further levels of growth, and discussions will continue between the local authorities to ensure appropriate infrastructure is identified and implemented. It has been determined via the Infrastructure Delivery Plan (EXAM39 and 40) that the SWDPR infrastructure needs will be met from within the SWCs administrative areas.
- 6.13. There is a functional and physical relationship between settlements in the Vale of Evesham, i.e. Evesham and Pebworth, in Wychavon District and the surrounding area in Stratford-on-Avon District, particularly Long Marston. Evesham provides services and facilities for its residents and those living in the wider rural hinterland in the Vale, correspondingly with Stratford-upon-Avon further afield.
- 6.14. Within the SWDPR, Evesham is identified as an urban area, and new housing/mixed use sites in the town have been allocated to deliver 255 new dwellings. In addition, several SWDP sites have been reallocated, including 200 dwellings off Abbey Road totalling 366 dwellings, several of which either completed or with permission. Alongside the residential allocations the SWDPR is proposing 21.43ha of new employment land. Pinvin is a Category 2 settlement where a site is allocated for 34 dwellings has been allocated. In bringing forward future housing sites through the South Warwickshire Local Plan (SWLP)

there may be potential to direct further growth in and around Long Marston. Through ongoing Duty to Cooperate discussions and representations to the statutory consultation stages of the SWLP the SWC and Stratford-on-Avon District will ensure ongoing dialogue with respect to the proposals at Long Marston. There have been no objections raised by the SWCs to the early stages of forward planning associated with the SWLP.

Other Strategic Matters

Transportation

- 6.15 Historically, and particularly in the Vale of Evesham, vehicle traffic on the rural road network has been considered an issue and been addressed by the three neighbouring districts of Wychavon, Stratford-on-Avon and Cotswold and their respective highways authorities at County Council level. Further transport modelling has been undertaken by Worcestershire County Council for the development proposed in the SWDPR, using the countywide model undertaken in the autumn of 2024 and referred to as the Worcester Strategic Transport Model (EXAM42-47A). This set of documentation consider the implications for transport cross boundary. The SWDPR Forecasting Report (EXAM43) sets out the geographical area for the modelling at para 2.2 which includes Stratford-on-Avon District within Warwickshire County as part of the “Rest of the Fully Modelled Area”. The highway flow plots in chapter 7 of the Forecasting Report (EXAM43) set out the impact of the SWDPR allocations beyond the county boundary for the ‘do nothing’, ‘do minimum’ and ‘do something’ scenarios. The modelling suggests that the SWDPR growth can be delivered without unacceptable, severe impacts on the highways network. To date, Warwickshire County Council (as highways authority in Warwickshire) have not reviewed the report or its conclusions.
- 6.16 An issue for further discussion has been the absence from the SWDPR of the Vale of Evesham HGV Control Zone policy SWDP 11 set out in the adopted 2016 SWDP. The policy was originally included in the 2006 Wychavon District Local Plan and carried forward to the 2016 SWDP. Since then, the policy has had only limited application through the DM process which is why it was not replicated in the SWDPR. Furthermore, Worcestershire County Council are content that a variation in the Local Validation Checklist for planning applications that requires applicants to consider any additional HGV trips generated by the development proposal is sufficient to address HGV movement in the Vale of Evesham. Reciprocal policies on this topic appear in the adopted 2016 Stratford Core Strategy and adopted 2018 Cotswold District Local Plan. At present, the Vale of Evesham HGV Control Zone policy is proposed to be carried forward by Stratford-on-Avon District Council in the South Warwickshire Local Plan, subject to the results of public consultation on the draft SWLP and discussions with Warwickshire County Council. Whilst there have been no representations made on the absence of this policy from the SWDPR, the SWCs are having Duty to Cooperate discussions with Warwickshire County Council relating to their concerns that the policy is not in the SWDPR. This may lead to the issue being included in the SoCG between Warwickshire CC and the SWCs.
- 6.17 Furthermore, joint discussions between the SWCs and Stratford-on-Avon District Council and respective county councils and National Highways on the upgrading of the A46(T) from Jct. 8 on the M5 to Jct. 15 of the M40 have taken place. Both the SWCs and Stratford-on-Avon District Council, along with the respective county highway authorities, continue to support this strategic transport infrastructure upgrade.

- 6.18 Land in the SWDPR continues to be safeguarded at Honeybourne for the reinstating of a rail link from the Cotswold Line to Stratford-upon-Avon at some future date.
- 6.19 The Parties to this SOCG will continue to support active travel solutions and approaches to sustainable transport on a cross-boundary basis, alongside the respective county councils.

Gypsies and Travellers

- 6.20 The South Worcestershire Gypsy and Traveller Accommodation Assessment (GTAA), published in 2019, informed the early stages of the SWDPR but has been superseded by an Update to the GTAA published in 2024. The GTAA Update identifies a requirement for 63 permanent Traveller pitches and 12 permanent Travelling Showpeople plots between 2024 and 2029. It also identifies a likely longer-term requirement for 38 Traveller pitches and 1 Travelling Showpeople plot between 2029 - 2034; 42 Traveller pitches and 1 Travelling Showpeople plot between 2034-2039; and 24 Traveller pitches and 2 Travelling Showpeople plots between 2039-2041.
- 6.21 The SWCs have put forward a strategy for the delivery of sites through proposed modifications to the gypsy and traveller policy in the SWDPR. The Inspectors will decide through the examination process the soundness of this approach or whether a separate site allocations DPD is required as previously put forward. However, it is the intention that the SWCs will be meeting the entirety of the identified need within its administrative areas and that none of the potential gypsy and traveller pitch allocations are near to the administrative boundary with Stratford-on-Avon.

Climate Change and the Renewable Energy

- 6.22 To increase the security of energy supply and reduce greenhouse gas emissions the SWDPR proposes to allocate nine solar farms in south Worcestershire. The allocation is included within SWDPR 59: Renewable and Low Carbon Energy Site Allocations and the 3.5ha site RLCE018 on Land off Alcester Road, Harvington proposed is near the Stratford-on-Avon administrative boundary. The site allocations are supported by the Renewable and Low Carbon Energy Site Assessment Background Report (July 2022). The report does not directly assess the potential wider impacts on the highway network, and specifically for this site on roads in Stratford-on-Avon District. However, reference is made to the requirement for a Travel Assessment (p.123) as part of any planning application. This is reflected in criterion B and C of SWDPR 59 and any cumulative impacts on the highway infrastructure in Stratford-on-Avon District would need to be considered and addressed through this aspect of the Development Management process.
- 6.23 Further the Background Report assesses the wider impacts of the proposed allocation in terms of landscape, habitat and biodiversity etc. These, along with any highway issues will be considered through additional evidence and studies in support of a planning application at the appropriate time and against all relevant planning matters via the Development Management process.

Natural Environment, including National Landscapes / Areas of Outstanding Natural Beauty and Proposed New Areas of Informal Recreation

6.24 The Cotswolds National Landscape or AONB is a nationally important landscape and forms an important part of the borders between south Worcestershire, Stratford-on-Avon District, Cotswold District, Tewkesbury District and the respective counties of Gloucestershire and Warwickshire.

6.25 The SWCs and Stratford-on-Avon District Council will continue to work together to conserve and enhance the landscape and scenic beauty of the Cotswold National Landscape.

Neighbourhood Plans

6.26 Currently the following designated Neighbourhood Plan areas and made NDP's are situated on the South Worcestershire and Stratford-on-Avon District Council border:

- Pebworth (Made September 2019)
- Honeybourne (Made April 2020)
- Long Marston (Made April 2024)
- Quinton (Made February 2023)
- Bidford-on-Avon (Made July 2017)
- Salford Priors (Made July 2017)
- Alcester (Made July 2021)

The SWCs, specifically Wychavon District Council, Stratford-on-Avon District Council and the appropriate Relevant Bodies e.g. parish and town councils will continue to raise awareness of, and consult on, emerging Neighbourhood Plans at relevant stages.

7 Matters of Agreement

7.1 All the above matters are agreed between the SWCs and Stratford-on-Avon District Council.

8 Matters of Disagreement

8.1 There are no matters of disagreement between the SWCs and Stratford-on-Avon District Council.

9 Governance Arrangements

9.1 Governance arrangements are key to ensure that effective duty to cooperate discussions are undertaken and an appropriate SoCG prepared.

9.2 Updating of this SoCG will be linked to key milestones within the SWDPR and the joint South Warwickshire Local Plan being prepared by Stratford-on-Avon District Council with Warwick District Council.

10 Conclusions



10.1 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 Stratford-on-Avon District Council solely with respect to the SWDPR.

- ii) The parties will continue to work positively together and where relevant with other prescribed bodies on strategic cross boundary issues. Further SoCG between the parties will be prepared with respect to the South Warwickshire Local Plan as that progresses towards submission and adoption.

11 Signatories

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

South Worcestershire Councils	Stratford-on-Avon District Council
<p>Name: Ian Macleod</p> <p>Position: Director of Planning and Infrastructure, Malvern Hills and Wychavon District Councils on behalf of the South Worcestershire Councils</p> <p>Date agreed: 20 February 2025</p> <p>Signature:</p> 	<p>Name: Jo Bozdoganli</p> <p>Position: Policy Manager, Stratford-on-Avon District Council</p> <p>Date agreed: 12th February 2025</p> <p>Signature:</p> 
<p>Name: Duncan Rudge</p> <p>Position: Head of Planning, Worcester City Council</p> <p>Date agreed: 20 February 2025</p> <p>Signature:</p> 