

Mr P Lewis and Mr S Dean  
The Planning Inspectorate  
Temple Quay House  
2 The Square  
Temple Quay  
Bristol  
BS1 6PN

11 September 2024

Dear Inspectors,

**South Worcestershire Development Plan review – Update on work timetable**

Further to the Councils' Progress Update (EXAM 9A) provided on 31.07.2024 and subsequent Transport Model Update (EXAM 15) dated 03.09.2024, please find below a further update regarding the submission of updated and outstanding evidence documents.

The Councils will be submitting the following within the next working ten days:

- Analysis of Proposed Policies against December 2023 Written Ministerial Statement
- Updated Housing Requirements for Designated Neighbourhood Areas (HOU6) with 2021 Census data
- Economic Land Monitoring Report to 31 March 2023
- Additional evidence base report relating to Areas of Informal Recreation Allocations 2022 (ALL1)
- 'Curlew at Mitton - Review of Natural England's Position Statement June 2024' - Supplementary report relating to SWDPR 54: Land at Mitton: a report in response to Natural England's Position Statement re SA54 (EXAM 8)
- Updated Gypsy and Traveller Accommodation Assessment 2019 (HOU3)
- Updated Historic Environment Topic Paper 2022 and Heritage Appraisals (SP24 – SP26)

The remaining and outstanding item due to be sent is the Updated Economic Development Needs Assessment 2022 (ECO1 – ECO11), and this will be sent at the end of October alongside the other outstanding evidence base studies due at that time (Please see the attached programme of works at the end of this letter for more detail).

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We would like to apologise for the slippage in some timescales, but this has been due to new issues being raised by the updated reports; and we have continued to take the view that it is important to provide a solution to these issues to ensure the Plan can be found sound. Given the progress of the transport evidence base and the update provided above we hope that you are reassured that the Plan continues to make good progress and remain committed to working with you to resolve any outstanding issues. We believe this is a sound Plan that can progress to examination, and we would like to explore possible hearing dates in this regard.

If you have any further questions about the work we are doing regarding the evidence or queries, please do not hesitate to let us know.

Yours sincerely,

**Ian Macleod**

Director of Planning and Infrastructure  
Malvern Hills and Wychavon District  
Councils

**Duncan Rudge**

Head of Planning  
Worcester City Council

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## Updated work timetable

Item	Status	Comment
<b>Analysis of Proposed Policies against December 2023 Written Ministerial Statement</b> Resource: SWC Officers	To be submitted within the next 10 working days on receipt of this letter.	
<b>Curlew at Mitton – ‘Review of Natural England’s Position Statement June 2024’ - Supplementary report relating to SWDPR 54: Land at Mitton: A report in response to Natural England’s Position Statement re SA54 (EXAM 8)</b>	To be submitted within the next 10 working days on receipt of this letter.	Discussions are taking place with Tewkesbury Borough Council in regard to meeting their unmet housing need and the issues raised by this report.
<b>Updated Gypsy and Traveller Accommodation Assessment (HOU3)</b> Resource: SWC Officers and external consultant	The report will be submitted within the next working 10 days.  An updated topic paper will be produced by the end of October.	In our correspondence dated 31.07.2024, it was noted that the gypsy and traveller need had significantly increased, and the SWC were exploring options to address this need. This work is progressing, and a topic paper will be provided by the end of October in this regard.
<b>Updated Retail and Town Centres Study (ECO12, EXAM4 and EXAM4A – EXAM4C)</b> Resource: SWC Officers and external consultant	This has been published on the Examination website.	
<b>Updated Economic Development Needs Assessment (ECO1 – ECO11)</b> Resource: SWC Officers and external consultant	This will be submitted by 31.10.2024 alongside a topic paper.	The draft updated assessment has resulted in a reduced need. Officers have been exploring reasons for this and have commissioned further work by the Consultants. The updated report will be submitted

# SOUTH WORCESTERSHIRE Development Plan

Item	Status	Comment
		alongside a contextual topic paper to provide an explanatory narrative by the end of October.
<b>Economic Land Monitoring Report to 31 March 2023</b> Resource: SWC Officers	To be submitted within the next 10 working days on receipt of this letter.	
<b>Additional evidence base report relating to Areas of Informal Recreation Allocations (ALL1)</b> Resource: SWC Officers and external consultant	To be submitted within the next 10 working days on receipt of this letter.	
<b>Updated Historic Environment Topic Paper and Heritage Appraisals (SP24 – SP26)</b> Resource: SWC Officers and external consultant	To be submitted within the next 10 working days on receipt of this letter.	For context, the Councils are working on resolving specific objections from Historic England (HE) relating to four proposed allocations (See Appendix 3 for updated Topic Paper: Heritage Appraisals). One objection has since been withdrawn and Officers are in communication with Historic England and intend to resolve the remaining objections by incorporating agreed solutions into an overarching Statement of Common Ground.
<b>Updated Housing Requirements for Designated Neighbourhood Areas (HOU6) with 2021 Census data</b> Resource: SWC Officers	To be submitted within the next 10 working days on receipt of this letter.	
<b>Updated Housing Topic Paper (HOU4) Housing Topic Paper</b>	This will be submitted to the Inspectors by 31.10.2024	

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Item	Status	Comment
<b>Resource: SWC Officers</b>		
<b>Update Housing Trajectory (HOU5)</b> <b>Resource: SWC Officers</b>	This will be submitted to the Inspectors by 31.10.2024	
<b>Transport Modelling (SWTM) with sensitivity analysis</b> <b>Resource: Worcestershire County Council, National Highways, external consultants and SWC Officers</b>	Please see letter to Inspectors regarding Transport Model update dated 03.09.2024 (EXAM 15).	
<b>Updated Infrastructure Delivery Plan (INF1), incorporating output from updated evidence documents and Transport Modelling with sensitivity analysis.</b> <b>Resource: SWC Officers and external consultant</b>	Draft will be submitted end of December.	The production of these reports is an iterative process and is dependent on the finalisation of the other evidence. A draft of the updated IDP and viability report will be provided to the Inspectors in December once the Transport modelling and associated mitigation measures are progressed, with the finalised versions being provided prior to hearings.
<b>Updated SWDPR and Community Infrastructure Levy Viability Review (VIA1), incorporating output from updated evidence documents.</b>  <b>Updated Retail and Commercial Community Infrastructure Levy Viability Review (VIA2), incorporating output from updated evidence documents.</b>	Draft will be submitted end of December.	The production of these reports is an iterative process and is dependent on the finalisation of the other evidence. A draft of the updated IDP and viability report will be provided to the Inspectors in December, with the finalised versions being provided prior to hearings.

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Item	Status	Comment
<p><b>Updated Strategic Site Local Plan Viability Report (VIA3), incorporating output from updated evidence documents and Transport Modelling with sensitivity analysis.</b></p> <p><b>Resource for all above: SWC Officers and external consultant</b></p>		
<p><b>Schedule of Main Modifications</b> <b>Resource: SWC Officers</b></p>	We intend to send these to the proposed timescale prior to examination.	
<p><b>HRA evidence re nutrient neutrality</b> <b>Resource: SWC Officers and external consultant</b></p>	We intend to send these to the proposed timescale prior to examination.	Officers are working to address any issues in relation to Nutrient Neutrality, as relates to the River Wye SAC catchment (River Lugg SSSI component only). This concerns a small area of the Malvern Hills District and, further, the SWDPR does not propose any site allocations within this area. Whilst Natural England did not raise any issues regarding Nutrient Neutrality during the Regulation 19 consultation stage, they have since raised concerns directly to the Councils. It is proposed that a Statement of Common Ground sets out any actions the Councils intend to take in response to the issues raised. The Inspectors of the SWDPR can then instruct if an update of the HRA (CD6 and CD7) is considered necessary.
<p><b>All Statements of Common Ground</b></p>	Statements of Common Ground are progressing, and we intend to send these to the proposed timescale.	

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