

**Statement of Common Ground between the South
Worcestershire Councils (Malvern Hills District Council,
Wychavon District Council and Worcester City Council)
and Bromsgrove District Council**

Date: 8 April 2024



Bromsgrove
District Council
www.bromsgrove.gov.uk



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 Bromsgrove District Council that prepared and adopted The Bromsgrove District Local Plan 2011 - 2030 and is undertaking a review of The Bromsgrove District Local Plan 2011-2030, 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 (SoCG), 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 (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries (NPPF, September 2023, Para 24)*

² *'In order to demonstrate effective and on-going joint working, strategic policymaking 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' (NPPF, September 2023, Para 27).*

³ Paragraph: 011 Reference ID: 61-011-20190315 (PPG, 2019)

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.'*⁴

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 Bromsgrove District Council.
- 4.2. The administrative areas of Malvern Hills District Council, Wychavon District Council and Worcester City Council are located in Worcestershire County. Wychavon District Council's administrative area adjoins Bromsgrove District Council, which is located in Worcestershire County.
- 4.3. As the South Worcestershire Councils and Bromsgrove 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. The map below illustrates the location of the South Worcestershire Councils and Bromsgrove District Council:

⁴ Paragraph: 011 Reference ID: 61-011-20190315, PPG (2019)

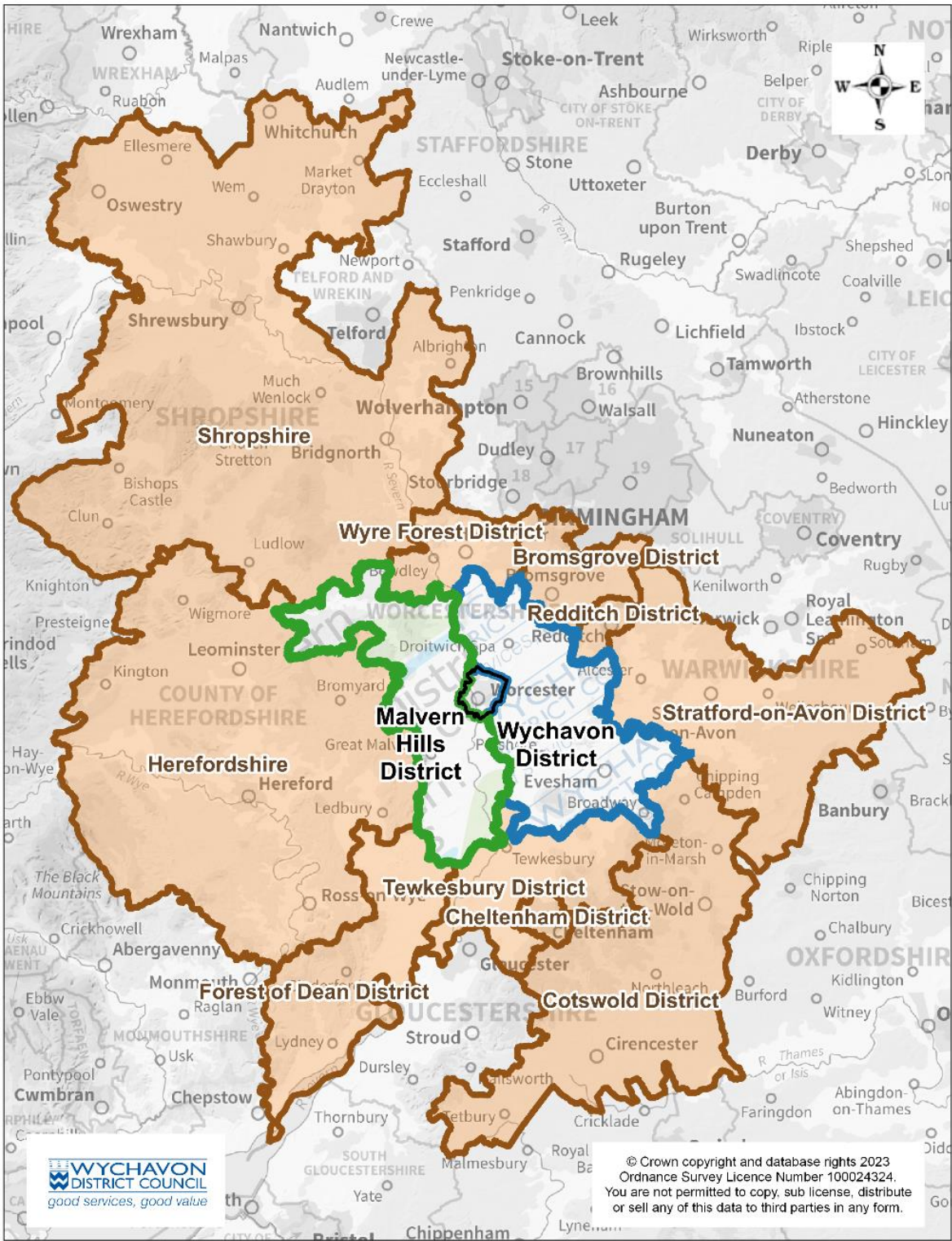


Figure 1 Map of SWCs and Neighbouring Authorities

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), Minerals Local Plan (2022), Worcestershire Waste Core Strategy (2012), together with made Neighbourhood Development 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 Bromsgrove 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 Bromsgrove 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 SWC and Bromsgrove District Council.

- Bromsgrove District Council agreed that the SWCs Strategic Green Belt Purposes is consistent with the Bromsgrove District Green Belt Purposes Assessment Methodology due to cross boundary issues.
- Bromsgrove District Council generally support the Strategic Objectives, although in order for Worcester's sub regional role to be promoted, the South Worcestershire Councils will also need to ensure that adequate housing supply is provided to match jobs growth through their plan review.
- Bromsgrove District Council are supportive of the settlement hierarchy and the planned approach to sustainable development. In particular they note that Worcestershire Parkway and Throckmorton airfield have been identified as stand-alone settlements under Urban Area (2) category.
- Policy SWDPR3: Strategic Transport Links is generally supported and in particular the intention to provide additional transport infrastructure. Bromsgrove District Council would remind the South Worcestershire Councils it was agreed that the South Worcestershire authorities would share any outputs from County wide transport modelling. This is particularly important where proposals and new infrastructure provision may affect the A38; M5 or rail connections to the conurbation.
- Bromsgrove District Council wish to have sight of the strategic Transport Assessment in order to establish whether there will be any cross-boundary implications.

6.2. It is considered that the Duty to Cooperate process has been progressed in a positive and progressive manner by both bodies. Whilst this SoCG identifies outstanding areas where there remains some disagreement between the Parties, it is considered this does not represent a failure of the Duty to Cooperate process, but instead are issues which can be discussed through the Examination into the South Worcestershire Development Plan if considered necessary.

Housing Market Area

6.3. 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.

6.4. 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 Bromsgrove District Council have liaised closely during the SWDPR process, in accordance with the duty to cooperate.

Housing Need and Requirement

6.5. Using the Government's standard method calculation (using the 2022 baseline data and median workplace-based affordability ratio published in 2022, 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.

- 6.6. In summary, the SWCs are proposing to meet the entirety of their LHN within the South Worcestershire HMA and are therefore not seeking Bromsgrove District Council to meet any of their need.

Employment Land Requirement

- 6.7. The Economic Development Needs Assessment (EDNA) published in March 2022, has informed the need for employment land in the SWDPR for the period to 2041. The EDNA currently identifies a gross employment land demand for 350.50 ha, of which 71.75 ha is already committed, i.e. planning permissions plus proposed SWDP allocations without planning permission. The proposed employment allocations in the SWDP Review total 290.70ha (including 75 ha at the strategic locations). This gives a surplus of 11.95ha of employment land across the plan area. The SWCs are proposing to meet the entirety of their employment land requirement within South Worcestershire and are therefore not seeking Bromsgrove District Council to meet any of their need.

Distribution of Development

- 6.8. 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.
- 6.9. 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.
- 6.10. 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 1445 new dwellings across Category 1, Category 2 and Category 3 villages.
- 6.11. Bromsgrove 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 in order to facilitate rail travel and reduce dependence on the private car.

7. Other Strategic Matters

Gypsies and Travellers

- 7.1. The South Worcestershire Gypsy and Traveller Accommodation Assessment (GTAA), published in 2019, informs the SWDPR. The GTAA identifies a requirement for 30 permanent Traveller pitches and 7 permanent Travelling Showpeople plots between 2019 and 2023. It also identifies a likely longer-term requirement for 20 Traveller pitches and 1 Travelling Showpeople plot between 2024-2028; 22 Traveller pitches and 1 Travelling Showpeople plot between 2029-2033; and 32 Traveller pitches and 1 Travelling Showpeople plot between 2034-2041.
- 7.2. The SWCs have identified sites in a draft Traveller and Travelling Showpeople Policy and Site Allocations Development Plan Document (T&TS DPD). The SWC will update annually the supply of deliverable sites, with a rolling five-year cumulative requirement for pitches, set against a rolling five-year delivery of pitches. When planning permissions are granted for permanent pitches through the development management process, they will contribute towards the required 5-year land supply. Between 1 January 2019 and May 2023 planning permission was granted for 72 new pitches and 2 Travelling Showpeople plots in south Worcestershire. The SWCs consulted on the Regulation 19 Publication version of the T&TS DPD in November and December 2022. None of the Traveller sites proposed are in close proximity to Bromsgrove District Council. The SWCs intend to address their own needs for Traveller and Travelling Showpeople provision within south Worcestershire through the T&TS DPD.

Infrastructure Provision

- 7.3. Worcestershire has a mature economy, with well-established transport networks and connectivity between economic centres already in place. The SWDPR aims to ensure that development brings about improvements to the transport network. The Worcestershire LTP4 and associated local transport plan policies, Infrastructure Delivery Plan and overarching strategies (including the Worcester Transport Strategy) provide the basis on which to develop and deliver the existing network.
- 7.4. Improved public transport (including a new rail station and associated car park) is proposed as part of the proposed expansion of Rushwick, 2.5 miles south-west of Worcester city. The proposed rail station is likely to improve connectivity for those travelling from Herefordshire to Worcester and destinations beyond.
- 7.5. Both the SWCs and Bromsgrove District Council recognise the strategic significance of the M5 / M42 corridor. This corridor:
- Provides strategic links between the SWCs area and Bromsgrove District area and to the wider West Midlands region.
 - Offers strategic employment and investment opportunities, having considered constraints such as the Green Belt.

- 7.6. Both the SWCs area and Bromsgrove District Council support the development of the strategic corridor and acknowledge the need for proportional infrastructure contributions from development sites, recognising the cumulative impact of such development.

Climate Change and the Renewable Energy

- 7.7. To increase the security of energy supply and reduce greenhouse gas emissions the SWDPR proposes to allocate 9 solar farms in south Worcestershire. None of the proposed solar farms are in close proximity to the Bromsgrove District Council administrative boundary.

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

- 7.8. The Cotswolds National Landscape and Malvern Hills Area of Outstanding Natural Beauty (AONB) are nationally important landscapes and form an important part of the borders between south Worcestershire, Cotswold District, Tewkesbury District and Herefordshire.
- 7.9. To reduce the pressure from increased footfall on the Malvern Hills, the SWDPR will propose designating three new Areas of Informal Recreation (AIRs) in south Worcestershire. Bromsgrove District Council's administrative area is unlikely to add significant pressure on the Malvern Hills from any proposed development due to its lack of proximity to the area.

Neighbourhood Plans

- 7.10. Currently, the following designated Neighbourhood Areas adjoin south Worcestershire and Bromsgrove District Council – Dodderhill and Hanbury (all Wychavon) with no designated Neighbourhood areas in Bromsgrove District. The SWC's and Bromsgrove District Council will continue to raise awareness of, and consult on, emerging Neighbourhood Plans at relevant stages.

Minerals and Waste

- 7.11. Worcestershire County Council is the Minerals and Waste Planning Authority for Worcestershire. The South Worcestershire Councils are therefore not responsible for allocating minerals or waste sites. Therefore, no significant cross boundary issues are identified.

8. Matters of Agreement

- 8.1 All the above matters are agreed between the SWC's (Malvern Hills District Council, Wychavon District Council and Worcester City Council) and Bromsgrove District Council.

9. Matters of Disagreement

- 9.1 There are no matters of disagreement between the SWC's and Bromsgrove District Council.

10. Governance Arrangements


- 10.1 Governance arrangements are key to ensure that effective duty to cooperate discussions are undertaken and an appropriate SoCG prepared.
- 10.2 Updating of this SoCG will be linked to key milestones within the SWDPR and Bromsgrove District Local Plan Review processes.

11. Conclusions

- 11.1 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 Bromsgrove District Council.
 - ii) The parties will continue to work positively together and where relevant with other prescribed bodies on strategic cross boundary issues.

12. Signatories

- 12.1 This SoCG has been agreed and signed by the following:

South Worcestershire Councils	Bromsgrove District Council
Name: Ian MacLeod	Name: Kit Taylor
Position: Director of Planning and Infrastructure at Wychavon and Malvern Hills District Council	Position: Cabinet Member for Planning, Licensing and WRS
Date agreed: 08/04/2024	Date agreed: April 2024
Signature: 	Signature: Cllr Kit Taylor
And;	
Name: Duncan Rudge	
Position: Head of Planning, Worcester City Council	
Date agreed: 08/04/2024	
Signature: 