

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

Updated 26 February 2025



1. Introduction

- 1.1. In accordance with the NPPF (paragraph 25)¹, public bodies have a duty to cooperate on relevant strategic matters, which are required to be addressed in their Plans. Furthermore, local authorities should also engage with relevant bodies, including essential infrastructure providers. This engagement forms part of each local planning authority's evidence for their respective emerging Local Plans.
- 1.2. This Statement of Common Ground (SoCG) has been prepared to support the South Worcestershire Development Plan Review (SWDPR) and to fulfil the duty to cooperate requirements in accordance with paragraph 28 of the NPPF², as well as the National Planning Practice Guidance (NPPG) on Maintaining Effective Cooperation. This document sets out how South Worcestershire Councils (SWCs) have engaged with Worcestershire County Council (WCC) and National Highways (NH) throughout the plan making process.

2. Purpose

- 2.1. This SoCG has been produced to support the SWDPR, which has been jointly prepared by Malvern Hills District Council, Wychavon District Council and Worcester City Council (the SWCs). The document seeks to demonstrate alignment amongst all parties regarding the Strategic Road Network (SRN) which underpins the growth detailed in the emerging Local Plan.

3. Scope

- 3.1. The NPPG³ provides details on the scope of a SoCG, as 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;

¹ *Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers,, elected Mayors and combined authorities. (NPPF, 2023, Para 25)*

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

- 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 NPPG 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. The geographic context

4.1. This SoCG relates to the geographical area of South Worcestershire (see Figure 1), comprising Wychavon District, Malvern Hills District and the City of Worcester. This informal joint working arrangement, enabled under the Planning and Compulsory Purchase Act 2004, is for the purposes of cross-border spatial planning, was originally formed in 2016 via the adoption of the South Worcestershire Development Plan (SWDP). The geographical area remains consistent with the SWDP, which was submitted to the Planning Inspectorate in September 2023.

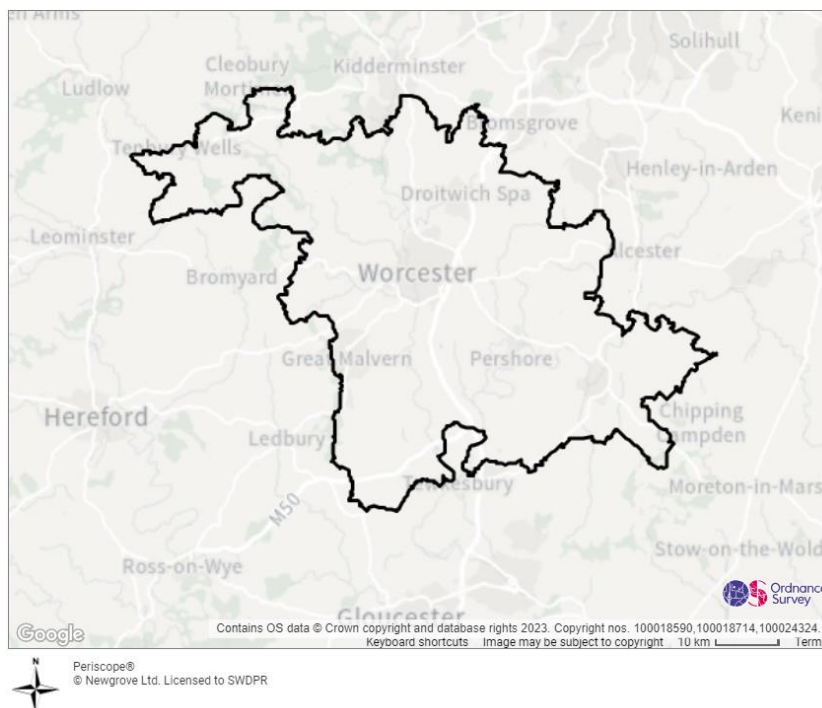


Figure 1. Map of South Worcestershire for plan-making purposes

⁴Paragraph: 011 Reference ID: 61-011-20190315

5. 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. 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.

6. Engagement Background

- 6.1. Engagement has taken place between WCC, SWC and National Highways throughout the plan-making process. The SWCs have consulted with WCC and National Highways⁵ at every stage. The Local Plan Review consultation periods were as follows:-
- Issues and Options Consultation – November/December 2018
 - Preferred Options Consultation – November/December 2019
 - Sustainability Appraisal – March/April 2021
 - Pre-Submission Consultation – November/December 2022
- 6.2. Outside of formal consultations, meetings have been held between SWCs, WCC and National Highways which began more regularly in 2021, following the outcome of the Preferred Options stage, when the broad areas for growth were identified. The meetings followed a similar agenda; SWDPR update, Strategic Transport Update (where issues were highlighted), Strategic Sites and an update on Development Management matters.
- 6.3. More recently, and naturally as the SWDPR Examination in Public draws closer, the level of engagement has increased significantly. SWCs, WCC, National Highways and all relevant and associated transport consultants attend weekly Tuesday morning progress meetings. The meetings are chaired by WCC and run the same agenda, reviewing the ongoing action log, the work programme (EXAM 15) and the key junction modelling relating to the SRN managed by National Highways; M5 junctions 6 and 7, M5 Junction 9, and the A46 Evesham Bypass. The lead for each junction presents their latest position, highlights any challenges and identifies the support they may require. The result may be additional meetings to discuss further detail. The weekly meetings themselves have been invaluable in maintaining momentum and efficient in bringing about solutions in real time.

⁵ National Highways may be referred to as Highways England within consultation responses. Highways England was rebranded as National Highways in August 2021.

6.4. There have also been two in depth half day workshops to discuss the output from the modelling process, which took place on 16.10.2024 and 18.11.2024. This is in addition to the ongoing and daily discussions, meetings and correspondence related to the project management of the transport modelling. The workshop on 16.10.2024 provided output from the Scenarios Do Nothing⁶ and Do Minimum⁷. This was presented by WCC's consultants Amey and Sweco. The presentation gave a summary of traffic movements across the south Worcestershire road network. This information had already been disseminated to National Highways' consultants concurrently to use in the running of the transport models relating to M5 junctions 6 and 7, M5 Junction 9, and the A46 Evesham Bypass. The workshop on 18.11.2024 ran a similar agenda, with WCC consultants providing a presentation showing the output from the Scenario Do Something⁸ across the South Worcestershire Road network, with the aim being to understand how the mitigation lessened the impact of the proposed growth within the SWDPR. Similarly National Highways' consultants gave a summary of the impacts on M5 junctions 6 and 7, M5 Junction 9, and the A46 Evesham Bypass in the SRN.

6.5. In order to provide full context and in addition to the consultations outline in 5.1, as part of the SWDPR, the SWCs have also consulted National Highways on the following:

- 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.
- Renewable and Low Carbon Energy Call for Sites - consultation concluded on 3 April 2020.
- Areas of Informal Recreation Call for Sites - consultation concluded on 24 July 2020.
- Traveller and Travelling Showpeople Site Allocations DPD Revised Preferred Options - consultation concluded on 5 July 2021.
- Traveller and Travelling Showpeople Site Allocations DPD Publication – consultation concluded on 13 December 2022.

⁶ Model output of how the full highway network operates in 2041 without the proposed SWDPR growth.

⁷ Model output of how the full network would operate at 2041 with all of the proposed SWDPR growth.

⁸ Model output showing the necessary highway and transport mitigation schemes and how the full network operates with these schemes alongside the proposed SWDPR growth.

7. Key Strategic Matters

Proposed Spatial Development Strategy

- 7.1. The spatial development strategy for the SWDPR is set out in policy SWDPR 03. In addition to policies which provide the overarching requirements and identify the settlement hierarchy, the aforementioned policy explains that the Plan provides predominantly for a rail-based strategy. The strategic sites at Worcestershire Parkway, Throckmorton, Rushwick and Mitton seek to achieve this aim, focussing growth around existing, enhanced and proposed railway stations.
- 7.2. Notwithstanding the focus on a rail-based strategy, the geographical context and district-wide patterns of development, rural in nature outside of Worcester City, necessitates travel via the road network. Part of the SWDPR vision is to enhance accessibility for residents through major improvements to the highways network. In particular to the M5 junctions and the A4440 at Worcester, alongside equally important upgrades to the local road networks.
- 7.3. Working in collaboration, a series of meetings have been held between National Highways and Worcestershire County Council to consolidate proposals and assess the impacts on the SRN. This also includes work to integrate the highways models for the M5 Junctions 6-7, A46 and M5 Junction 9. The outputs will provide a comprehensive view of the transport impact of growth within the SWDPR, and importantly, the highways mitigation required to support that growth.

8. Strategic Matters Identified

- 8.1. National Highways responded to the Preferred Options Consultation (Appendix 1), the SWDPR Regulation 18 Sustainability Appraisal Consultation (Appendix 2 within this SoCG) and Regulation 19 Pre-Submission Consultation (Appendix 3).
- 8.2. Their response to all consultations supported the overarching strategy of the SWDPR and development of the County-wide model, the Worcestershire Strategic Transport Model (WSTM). It reinforced the need for working in collaboration, welcoming a SoCG being put in place.
- 8.3. Following on from consultation responses and during ongoing discussions, three junctions were identified for improvements; M5 Junctions 6-7, A46 and M5 Junction 9. Working with WCC, National Highways identified three transport models which could potentially be used to measure the impact of growth within the SWDPR on the junctions and have subsequently been used to produce outputs based on three scenarios; Do Nothing 2041, Do Minimum

2041 and Do Something 2041, which seeks to identify the potential mitigation that would be required for the Plan. All three scenarios were completed on 2 December 2024 and fed into the Infrastructure Delivery Plan and further, into the Viability Documents supporting the SWDPR.

- 8.4. Following the completion of the scenarios detailed in para 8.3, and following further engagement with Gloucestershire County Council, a request was made to include additional development sites within the M5 J9 modelling. This work has since been undertaken, appended to the South Worcestershire Councils response to Matters, Issues and Questions on Matter 9, a summary of the resulting impacts have been set out in Paragraph 10 of this document, which presented a need to provide this updated Statement of Common Ground.

9. Matters of Agreement

- 9.1. All the matters aside from the specific issue at M5 J9 in relation to the allocation at Mitton, detailed at para 10 are agreed between the SWCs, WCC and National Highways in regard to the Worcestershire Strategic Transport Model and local and strategic road networks improvements seeking to support growth within the SWDPR.
- 9.2. National Highways and Worcestershire County Council are both satisfied that the transport modelling work undertaken to support SWDPR is sufficiently robust to ensure that housing and employment growth and associated development can be brought forward over the Plan period to 2041 in a sustainable way. Further that the modelling and the process through which it was achieved is consistent with national planning policy set out in the NPPF in so far as it relates to plan making and promoting sustainable transport, including ensuring that the SWDPR growth will not have an unacceptable impact on highway safety and the residual cumulative impacts on the strategic and local road networks will not be severe aside from the specific issue at M5 J9 in relation to the allocation at Mitton, detailed at para 10.
- 9.3. As per DfT Circular 01/2022 – “Strategic road network and the delivery of sustainable development”, the SWCs, WCC and National Highways will continue to evaluate the mitigation schemes and strategies proposed in order to best facilitate the delivery of local plan growth and ensure appropriate interventions are delivered to mitigate impacts on the strategic and local road networks.
- 9.4. The parties will continue to work collaboratively in the lead up to, and beyond, the Examination in Public for the SWDPR.

10. M5 Junction 9 Safety Issue in relation to the allocation at Mitton

10.1. The modelling undertaken by AECOM on behalf of National Highways and Worcestershire County Council (WCC) has presented evidence on the impact of committed development and the South Worcestershire Development Plan (SWDPR) growth, with and without the Mitton housing development and its associated mitigation measures

10.2. The following presents the key findings of the modelling exercise:

Without Mitton Development:

- The AM peak hour traffic modelling results indicated an unacceptable safety impact on the M5 Junction 9, specifically the northbound off-slip.
- Observed queueing extended back onto the main carriageway between approximately 08:30 and 08:45, in three out of ten model runs posing an unacceptable safety impact.
- Future mitigation measures are required to manage the queueing on this off-slip.

Impact of SWDP without Mitton:

- The Worcestershire Strategic Transport Model (WSTM) highlighted that an additional four vehicles during the AM peak hour are likely to use the northbound off-slip.
- Given that approximately 1,370 vehicles use the northbound off slip road during the AM peak hour, the inclusion of four vehicles (0.3%) cannot with certainty be demonstrated to be detrimental to the operation of the slip road.
- It is agreed between the SWCs, WCC and National Highways that mitigation measures are not necessary for these additional four vehicles.

With Mitton Development:

- The inclusion of the Mitton development exacerbates the situation, although the number of instances where the northbound off-slip queued back onto the M5 main carriageway remained consistent with the 'without Mitton development' scenario.
- The addition of 30 vehicles generated by the Mitton development on the northbound off-slip is likely to increase the possibility of queues stretching back onto the main carriageway approximately between 08:30 and 08:45.
- Daily variations have the potential to be greater than 30 vehicles, however, the evidence does not show this.
- Increasing the capacity of the northbound off-slip to mitigate against the Mitton development showed improved performance, reducing the frequency of queueing back onto the M5 main carriageway from three per ten model runs to one per ten model runs, however, since the possibility of queueing back onto the M5 main carriageway still remains, further mitigation measures need to be considered before the Mitton development can be brought forward.. Mitigation in the form of an extended flare to the M5 J9 northbound off-slip has the potential to mitigate the impact of the Mitton development,

It is important to acknowledge the uncertainty within the modelling. The assessments conducted are notably robust, incorporating developments such as the committed Garden Centre and Retail Development at Ashchurch. National Highways recognise the impact of the committed development on the M5 J9 as an unacceptable safety impact. The inclusion of the Mitton development without any proposed increase in capacity to the northbound off-slip would exacerbate the issue further. In contrast, the South Worcestershire Development Plan's impact without Mitton does not merit any mitigation measures.

A more comprehensive mitigation scheme for M5 J9 is likely to be required to mitigate impacts of future housing and employment growth in Gloucestershire, and this will be for development promoters and the emerging Cheltenham, Gloucester and Tewkesbury Strategic Local Plan to address in collaboration with National Highways.

11. Matters of Disagreement

11.1. There are no matters of disagreement between SWCs, WCC and National Highways in regard to the Worcestershire Strategic Transport Model and local and strategic road networks improvements seeking to support growth within the SWDPR.

12. Governance Arrangements

12.1. The governance arrangements are key to the effectiveness and implementation of the SoCG. The table below sets out the requirements for the authorities involved.

Authority	Method of Approval
South Worcestershire Councils (Wychavon District Council (WDC), Malvern Hills District Council (MHDC) and Worcester City Council (WCityC))	<p>SoCG to be signed off by:</p> <p>Director of Planning and Infrastructure (WDC and MHDC)</p> <p>Head of Planning (WCityC)</p>
National Highways	<p>SoCG to be signed off by</p> <p>Russell Gray – Spatial Planner</p>
Worcestershire County Council	<p>SoCG to be signed off by</p> <p>Head of Planning and Transport Planning</p>


13. Conclusion



13.1. All parties agree that:

- i. The SWCs have fulfilled their Duty to Cooperate with National Highways.
- ii. National Highways is satisfied that all matters raised in its representations to the SWDPR have been satisfactorily addressed by SWC and WCC responses and the transport modelling undertaken to support SWDPR.
 - In respect of the M5 J9 specific issue, SWCs, WCC and National Highways agree that whilst mitigation in the form of an extended flare to the M5 J9 northbound off-slip has the potential to mitigate the impact of the Mitton development, a more comprehensive mitigation scheme for M5 J9 is likely to be required to mitigate impacts of committed and future housing and employment growth in Gloucestershire and this will be for Gloucestershire County Council to design, model and deliver in collaboration with National Highways.
- iii. The parties will continue to work positively and proactively together, including with other authorities where relevant, on strategic cross boundary issues.

14. Signatories

14.1. The SoCG has been agreed and signed by the following:

<p>South Worcestershire Councils (Wychavon and Malvern Hills District 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: 26.02.2025</p> <p>Signature: </p>	<p>South Worcestershire Councils (Worcester City Council)</p> <p>Name: Duncan Rudge</p> <p>Position: Head of Planning, Worcester City</p> <p>Date agreed: 26.02.2025</p> <p>Signature: </p>
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Worcestershire County Council	National Highways
Name(s): Emily Barker	Name(s): Russell Gray
Position: Head of Planning and Transport Planning	Position: Spatial Planner
Date agreed: 26.02.2025	Date agreed: 26.02.2025
Signature: 	Signature: 

15. Appendices

- Appendix 1 – National Highways response to the Preferred Options Consultation
- Appendix 2 – National Highways response to Regulation 18 Sustainability Appraisal Consultation
- Appendix 3 – National Highways response to Regulation 19 Pre-Submission Consultation.

Appendix 2 National Highways response to Regulation 18 Sustainability Appraisal Consultation

National Highways comment	SWC response
<p>Local Plans should promote development at locations that are or can be made sustainable, that allow for uptake of sustainable transport modes and support wider social and health objectives and support existing business sectors and enable new growth. General support an increase of development within and adjoining larger settlements as to lessen the impact on rural locations due to reduced vehicle trip generation and availability of key facilities and services, minimizing journey length. Objective 10 is helping in ensuring future development sites are supported by a range of easily accessible sustainable transport modes which help to reduce pressures on the transport network. Reducing the need to travel by car would also have a positive impact on air quality. SWDPR3 is also helpful in ensuring sustainable approach to development growth is adopted. We consider that this Policy should be updated to reflect the need for Highways England to be a consultee in the review of Transport Assessments for development sites which have the potential to impact on the SRN.</p>	<p>A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.</p>